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ABSTRACT

This handbook provides an overview of the Comprehensive Employment and Training Act (CETA) legislation, the Illinois Public Community College system, and provides the mechanics for the development of contracts for training and services by Illinois community colleges. It includes the following: (1) a summary of each of the eight titles of CETA, and a list of Illinois Prime Sponsors, Program Agents, and funding allocations; (2) the philosophy and purpose of the community college system and its financial operating history; (3) a description of CETA "5% funds" for vocational education and training and the role of the Illinois Department of Adult Vocational Technical Education (DAVTE) in administering these funds, plus a list of DAVTE Employment and Training staff; and (4) nine major steps for applying for CETA funds from a Prime Sponsor, the basic contents of a sub-agreement contract, and a model contract. (Author/RT)

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HANDBOOK

FOR

ILLINOIS PUBLIC COMMUNITY COLLEGES

AND

ILLINOIS PRIME SPONSORS

UNDER THE

COMPREHENSIVE EMPLOYMENT

AND

TRAINING ACT

(CETA)

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September, 1977

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INTRODUCTION

In September 1976, the Illinois Community College Board was one of three state of Illinois agencies awarded an Interagency Coordination Grant for Fiscal Year 1977. The grant's purpose was to increase the ability of Illinois Public Community Colleges to provide educational and training opportunities to economically disadvantaged, unemployed, and underemployed persons as identified by the Comprehensive Employment and Training Act (CETA) Prime Sponsors in Illinois.

This handbook attempts to provide an overview of the CETA legislation, the Illinois Public Community College system, and also to provide the mechanics for the development of contracts for training and services.

Part I summarizes each of the eight titles of the Comprehensive Employment and Training Act (CETA). A listing of Prime Sponsors, Program Agents, and funding allocations for FY 77 are included.

Part II describes the philosophy and purpose for the system of Illinois Public Community Colleges, the History of Community College Operating Finance, Enrollment Data, and Curriculum Inventory. Also included are a map and listing of community college districts and a list of CETA contact persons at the community colleges.

Part III describes a supplemental CETA grant for vocational education and training, and the relationship of the Illinois Office of Education, Department of Adult Vocational Technical Education (DAVTE) to the supplemental grant. Also included is a list of DAVTE Employment and Training staff.

Part IV includes nine major steps to follow when applying for CETA funds from a prime sponsor, a section on the basic contents of a sub-agreement contract, and a model contract.

An addendum, Part V, will be added when FY 77 reports are completed. It will contain information on the types of programs and services provided by the community colleges during FY 77. It will also include information on the amount of funding contracted between the Illinois Public Community Colleges and CETA prime sponsors, the number of participants served, and the kinds of education and training classes provided.

Special thanks are due the Illinois Community College Board; U.S. Department of Labor, Employment and Training Administration - Illinois Unit; Illinois Office of Education, Department of Adult Vocational and Technical Education; and Governor's Office of Manpower and Human Development, which provided information and reviewed the contents before publication.

It is sincerely hoped this material will prove useful to Illinois institutions seeking to provide vocational training, adult basic education, and supportive services.

Toni C. Harris
CETA Interagency Coordinator for the
Illinois Community College Board

September 15, 1977

PART I

I. Purpose and Approaches of Employment and Training Program

The Comprehensive Employment and Training Act (CETA) was signed into law by the President on December 28, 1973. It was designed to provide "job training and employment opportunities for economically disadvantaged, unemployed and underemployed persons," to enable them to secure and retain self-sustaining, unsubsidized employment. It is administered by the U.S. Department of Labor. CETA is the chief vehicle for manpower development and training programs, replacing the Area Redevelopment Act (ARA) of 1961, the Manpower Development and Training Act (MDTA) of 1962, the Economic Opportunity Act (EOA) of 1964, and the Emergency Employment Act (EEA) of 1971. Unlike the federally administered program efforts of the preceding 12 years, CETA offers a flexible decentralized system of comprehensive and decategorized training and employment subject to Federal agency oversight.

CETA Prime Sponsors are units of state and local government responsible for operating CETA employment and training programs to serve the needs of their communities. Prime sponsors are generally one of the following: states; cities or counties with populations of at least 100,000; or combinations of units of government called consortia, in which at least one member jurisdiction has a population of 100,000 or more. The Secretary of Labor may also designate additional sponsors if he/she determines that they have a special capacity for carrying out CETA programs within certain labor markets or rural areas with high unemployment. States may act as balance-of-state prime sponsors for smaller areas (usually rural) within their boundaries that are ineligible to become prime sponsors in their own right.

Prime sponsors are responsible for determining local needs and providing programs designed to meet them through such activities as classroom training, on-the-job training, work experience, public service employment, counseling, testing, job development, child care, and other supportive services. Sponsors can arrange to provide these services directly or through contracts or sub-grants with such organizations as the state employment service, vocational education agencies, community groups, or private firms. They are also responsible for monitoring and evaluating programs to insure that they meet local needs.

II. Titles, Funding and Eligibility

The act (as amended) contains the following eight titles:

Title I

The purpose is to provide employment and job training opportunities for the economically disadvantaged, unemployed and underemployed. An economically disadvantaged person is defined as a member of a family that receives cash welfare payments or whose annual income in relation to family size does not exceed the poverty level determined in accordance with criteria established by the Office of Management and Budget. (The most recent poverty-level income figure for a nonfarm family of four in the continental United States is $5,850.) An underemployed person is one who is working full time but whose salary in relation to family size is below the officially determined poverty level. Title I creates a decentralized program structure, placing the authority to plan and operate a flexible system of manpower services - including training, employment, counseling, testing, and placement - in the hands of prime sponsors.

For Title I, section 103 of CETA prescribes that 80 percent of the appropriated funds be distributed to prime sponsors on the basis of the number of unemployed persons and the proportion of low-income families in each prime sponsor's area, as well as its proportionate share of employment and training funds received in the previous year. The remaining Title I funds are distributed as follows: 5 percent for grants to Governors for vocational training services; 4 percent to Governors for flexible State activities; 5 percent for incentives to encourage the formation of consortia; and the remaining 6 percent for the discretionary use of the Secretary of Labor.

Title II

The purpose is to provide unemployed and underemployed persons with transitional employment in jobs providing needed public services in areas of "substantial unemployment" (defined as areas having 6.5 percent or more unemployment). The program is administered in the same decentralized manner as programs carried out under Title I.

Under Title II, 80 percent of the funds appropriated are distributed to Title I prime sponsors in a manner that takes into account the number of unemployed persons within their jurisdictions. The remaining 20 percent are distributed at the discretion of the Secretary of Labor, taking into account the severity of unemployment within eligible areas.

Any person living in an area of substantial unemployment who has been unemployed for at least 30 days, or is underemployed, is eligible to participate in Title II programs.

Title III

The purpose is to provide additional employment and training services to such special groups as Indians, migrant and seasonal farm workers, offenders, youth, and others whom the Secretary of Labor determines to have particular disadvantages in the labor market. This title also provides for research, demonstration, and evaluation programs to be administered by the Secretary. Funds are provided through Federal grants to Title I Prime Sponsors and/or private non-profit organizations. Grants are awarded through a competitive process. Through legislative action in July of 1977, Part C has been added to Title III for Youth Employment and Demonstration Programs.

Subpart I: Youth Incentive Entitlement for Pilot Projects. Fifteen percent of total available funds for Part C to Prime Sponsors by application to DOL. Projects to demonstrate and test various approaches that will guarantee jobs and/or training for economically disadvantaged youth 16-19 in school or willing to return to school.

Subpart II: Youth Community Conservation and Improvement Projects. Fifteen percent of total available funds to Prime Sponsors by application to DOL. Projects designed are mandated to coordinate with in-school or classroom training for academic credit for youth 16-19, experiencing "severe handicaps in obtaining employment."

Subpart III: Youth Employment and Training Programs. Seventy percent of total available funds to Prime Sponsors for general Title I activities targeted to youth 16-21 (in some instances 14-15). All but 10% of youth served must be from poverty level families.

Title IV

This title contains continuing authority for the Job Corps, originally authorized under Title I-A of the Economic Opportunity Act of 1964. This is the only national manpower program that retains a separate identity under CETA.

Title V

The purpose is to establish a National Commission for Manpower Policy to serve as an independent policy advisory group with responsibility for examining manpower questions and suggesting to the Secretary of Labor and the Congress particular means of dealing with them.

Title VI

(Created by the Emergency Jobs and Unemployment Assistance Act of 1974).

This Title provides for a large temporary program of emergency public service employment specially designed to help ease the impact of high unemployment generated by the recession of 1974-75.

Under Title VI, 90 percent of the funds appropriated are distributed to prime sponsors on the basis of the number of unemployed persons living within the prime sponsor's jurisdiction and the number of such persons living within areas of substantial unemployment. The remaining 10 percent are distributed by the Secretary of Labor, taking into account changes in the rate of unemployment.

Any person who resides within the prime sponsor's jurisdiction and either has been unemployed for at least 30 days - 15 days under certain conditions - or is underemployed is eligible to participate in the Title VI program.

Title VII

(Replaces the original Title VI when the Energy Jobs and Unemployment Assistance Act of 1974 became Title VI.)

This title provides for the General Provisions of the Act, including the definitions used in the Act, the provision for the publication of rules, regulations, and guidelines in the Federal Register, conditions applicable to all programs, and the provision for records, audits and reports.

Title VIII

The Young Adult Conservation Corps is part of the new youth legislation passed in July 1977. Seventy percent of the available funds will be for programs administered by the Agriculture and Interior Departments for unemployed youth 16-23. Thirty percent of the available funds are earmarked for sub-contracts with state or local governments, public or private non-profit organizations.

III. The Local Role

CETA requires each prime sponsor to establish a Planning Council with representation from all segments of the community, including (to the extent feasible) client groups and community-based organizations, the public employment service, education and training institutions, the business sector, labor, and where appropriate, agriculture.

The functions of the council are:

1. To submit recommendations to the prime sponsor regarding program plans, basic goals, policies and procedures.
2. To monitor and objectively evaluate employment and training programs in the prime sponsor's jursidiction.
3. To provide for continuing analysis of employment and training needs.
4. To provide an easily accessible channel of communication between the prime sponsor and the community.
5. To improve the utilization and coordination of the delivery services under CETA and other social services programs in the prime sponsor area.

IV. The State Role

The state role under CETA is multifaceted, encompassing the function of program operator, coordinator and evaluator. Functions are summarized as follows:

1. To provide services to the balance-of-state areas that do not fall within the jurisdictions of independent prime sponsors.
2. To provide services under the special provisions of Title I 5 percent vocational funds, 4 percent statewide manpower services funds and 5 percent incentive funds.

3. To appoint a manpower planning council representative of the geographic area to be served.
4. To provide staff support to the council.
5. To establish a planning process which insures equitable services for all jurisdictions in the prime sponsor area.
6. To establish an appeal procedure.
7. To promote cooperation between the business community, labor, client groups and community organizations in order to meet the employment and training needs of the prime sponsor area.

V. The Federal Role

The role of the Federal Government can be characterized as one of "oversight". The legislative intent of CETA was one of decentralization, of shifting responsibility from the Federal Government to the local level. While there is a strong and active Federal role at all stages of planning, review, and implementation, the day-to-day operations and decision making are retained at the State and local levels.

The four most significant elements of the Federal role are summarized as follows:

1. To establish national objectives, priorities and performance standards.
2. To provide technical assistance.
3. To review and approve plans.
4. To assess and evaluate performance.

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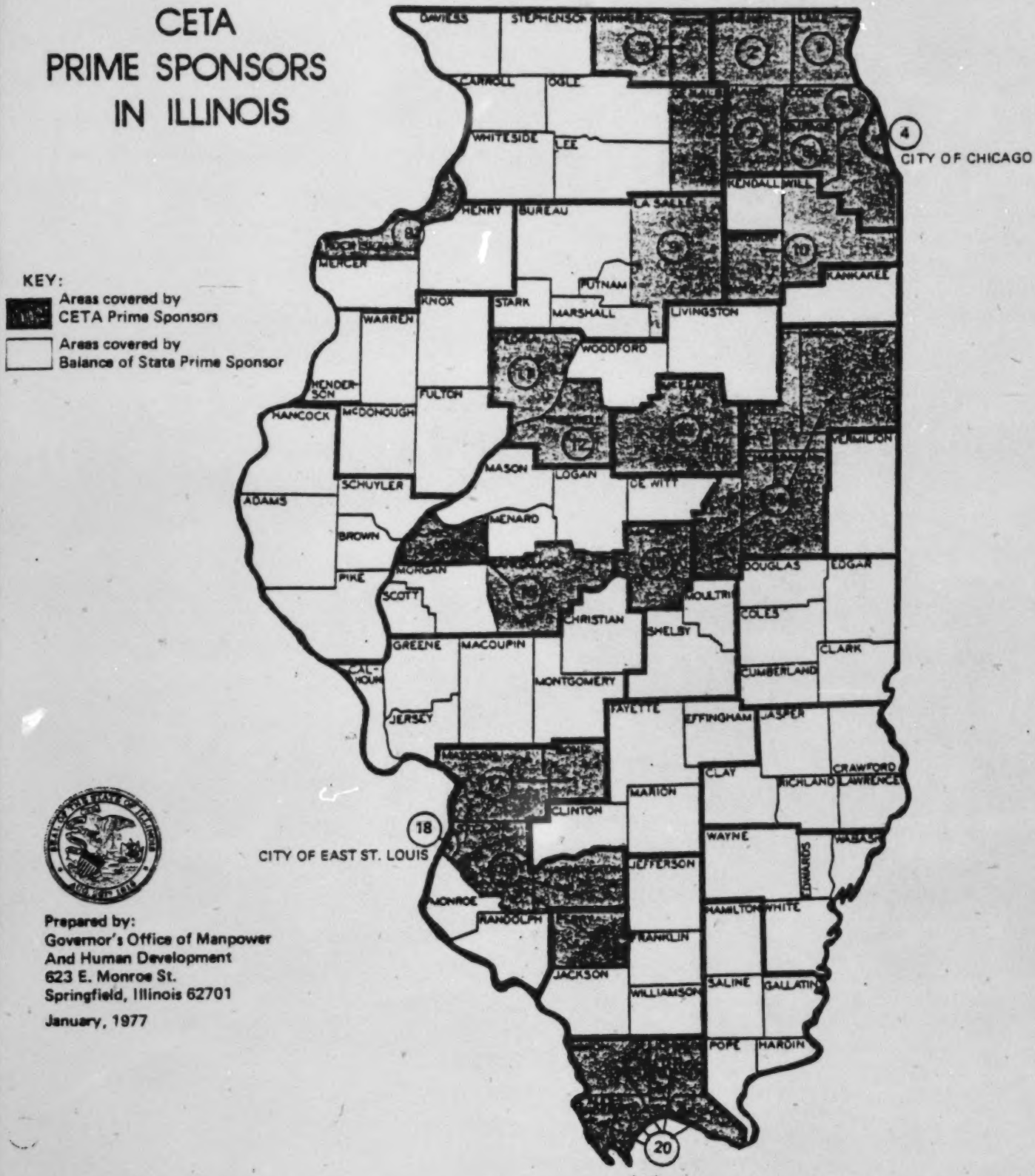

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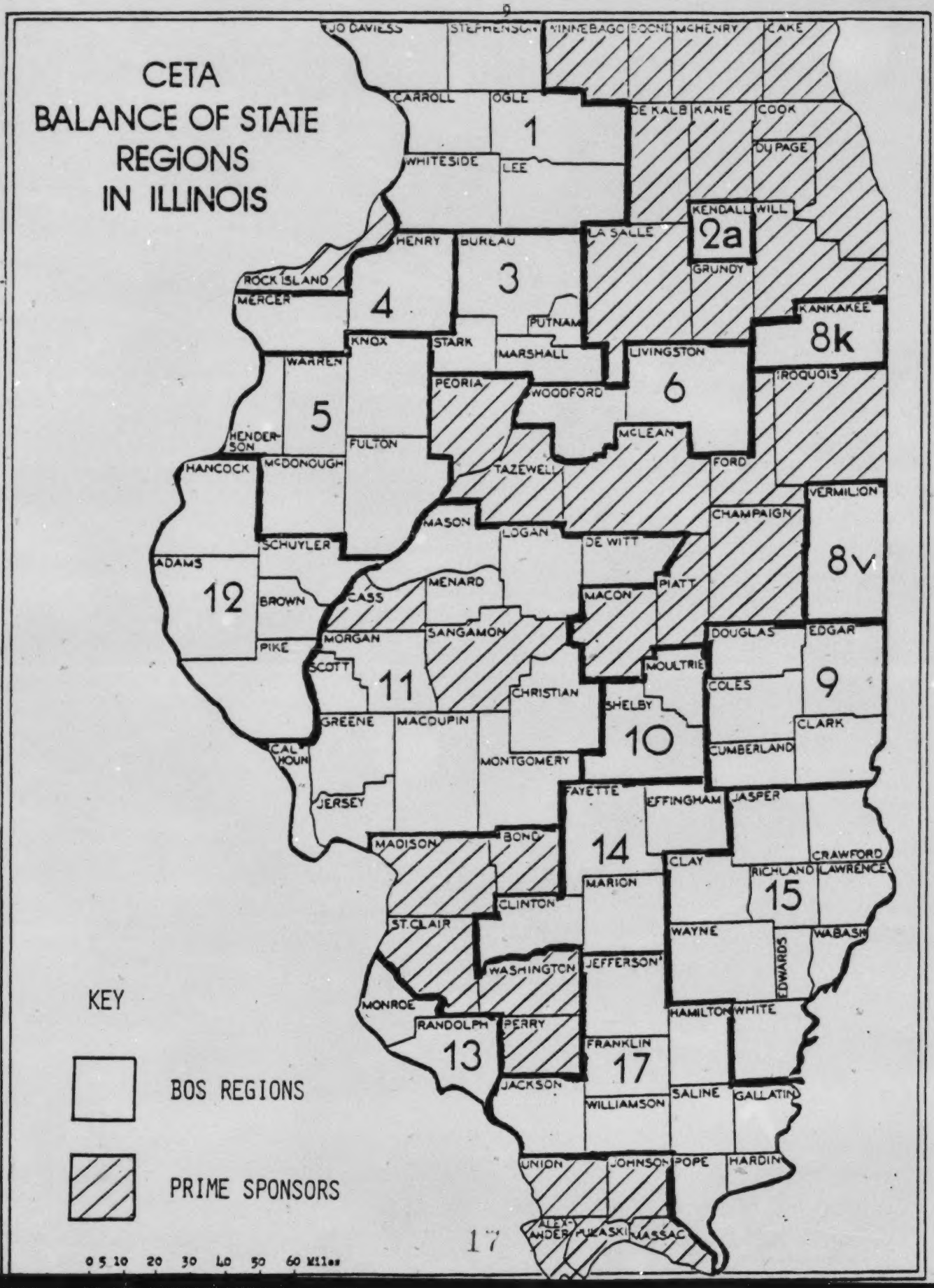
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OGLE
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MONTGOMERY
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PRIME SPONSORS
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REVISED: JUNE, 1977

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			JACKSON COUNTY BOARD Jackson County Court House Murphysboro, Illinois 62966 618/684-2151 618/687-2341 (Murphysboro E.S.)	Jackson
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Directory prepared by: Balance of State Division, Governor's Office of Manpower & Human Development, 623 E. Monroe St., Springfield, IL 62701 (217) 782-0118

FISCAL YEAR 1977 CETA FUND ALLOCATIONS TO PRIME SPONSOR AREAS BY TITLE

PRIME SPONSOR	TITLE I	TITLE II	TITLE III SUMMER PROGRAM	TITLE VI	TOTAL
City of Chicago	$29,919,108	$5,365,853	$22,860,602	$20,281,432	$78,426,995
Cook County	9,132,163	2,950,760	2,879,168	9,907,531	24,869,622
DuPage County	1,136,363	297,324	341,268	1,492,453	3,267,408
Kane County Csrt.	1,671,008	585,311	371,617	2,048,777	4,676,713
Lake County	1,761,345	554,456	442,677	1,959,407	4,717,885
Macon County	728,920	215,865	282,184	802,331	2,029,300
McHenry County	542,621	173,945	117,284	609,299	1,443,149
Rock Island County	872,074	246,489	197,529	869,086	2,185,178
Tazewell County	426,268	50,950	113,756	296,288	837,262
LaSalle County	537,016	170,609[4]	116,402	540,819	1,364,846
Rockford Csrt.	1,605,995[1]	533,707	361,548	2,018,700	4,519,950
Champaign Csrt.	930,933[2]	118,307	298,939	545,830	1,894,009
Will County Csrt.	1,417,717	445,371	414,459	1,608,860	3,886,407
Sangamon Cnty. Csrt.	878,947[3]	239,419	327,137	817,647	2,236,150
Madison Cnty. Csrt.	1,890,348	792,678[5]	696,552	2,247,520	5,627,098
St. Clair Csrt.	1,517,023	454,455[6]	418,290	1,430,352	3,820,120

Title I consortia incentive (12-17 -76), base (10-15-76)
Title II base (11-13-76) discretionary (2-17-77)
Title III (2-10-77)
Title VI (3-9-77)

1. includes $146,000 under consortia incentive
2. includes $84,630 under consortia incentive
3. includes $79,904 under consortia incentive
4. includes $28,364 discretionary funding
5. includes $324,100 discretionary funding

FISCAL YEAR 1977 CETA FUND ALLOCATIONS TO PRIME SPONSOR AREAS BY TITLE - CONTINUED

PRIME SPONSOR	TITLE I	TITLE II	TITLE III SUMMER PROGRAM	TITLE VI	TOTAL
Peoria Csrt.	$849,162	$134,829	$355,089	$638,828	$1,977,908
East St. Louis	2,326,166	727,396[7]	539,669	1,579,805	5,173,036
Shawnee Csrt.	1,042,616	533,649[8]	312,972	1,105,536	2,994,773
State of Illinois Balance of State	11,090,515	2,505,042	3,166,854	8,950,064	25,712,475
McClean Cty.	379,862		89,946	208,996	678,804
TOTAL	$70,656,170	$17,096,415	$34,703,942	$59,951,561	$182,408,088

6. includes $97,459 discretionary funding
7. includes $549,263 discretionary funding
8. includes $416,917 discretionary funding

PUBLIC SERVICE JOBS PROGRAM

ECONOMIC STIMULUS PACKAGE

	TITLE II	TITLE VI	TOTAL
Chicago City	18,844,535	85,028,347	103,872,882
Bal. of Cook County	4,827,375	30,831,515	35,658,890
DuPage County	176,249	4,381,545	4,557,794
Kane Co. Csrt.	1,190,504	5,922,638	7,113,142
Lake County	1,607,641	7,047,294	8,654,935
Macon County	765,180	3,354,178	4,119,358
McHenry County	511,653	2,193,344	2,704,997
Rock Island County	592,954	2,827,381	3,420,335
Tazewell County	93,511	1,119,053	1,212,564
La Salle County	499,156	2,029,013	2,528,169
Rockford Consortium	1,918,913	8,609,321	10,528,234
Champaign Consortium	374,907	2,224,424	2,599,331
Will County Consortium	1,445,900	6,038,875	7,484,775
Sangamon County Csrt.	761,734	3,370,779	4,132,513
Madison County Consortium	1,545,300	6,718,413	8,263,713
St. Clair Consortium	1,161,059	4,824,929	5,985,988
Peoria Consortium	487,234	2,674,338	3,161,572
East St. Louis City	575,717	2,773,352	3,349,069
Shawnee Consortium	412,396	1,883,971	2,296,367
Balance of Illinois	9,072,284	38,394,899	47,467,183
McLean County	0	899,052	899,052
ILLINOIS	46,864,202	223,146,661	270,010,863

PART II

PHILOSOPHY AND PURPOSES FOR THE SYSTEM OF PUBLIC COMMUNITY COLLEGES OF ILLINOIS*

The public community colleges of Illinois, by law and by performance, are part of the system of post-secondary and higher education for the State of Illinois. This system is under the general coordination and leadership of the Illinois Board of Higher Education and includes five basic segments--the University of Illinois system (three campuses), the Southern Illinois University system (two campuses), the Board of Regents system (three campuses), the Board of Governors system (five campuses), and the Public Community College system (currently 51 campuses).

The community college system strives to fulfill the mandate of the Illinois State Constitution of 1970 which indicates that "A fundamental goal of the People of the State is the educational development of all persons to the limits of their capacities." The community college system also is dedicated to the philosophy and concept of the public community colleges as set forth in the Master Plans for Higher Education in Illinois (1964, 1966, and 1971) and the Public Community College Act of 1965 as recodified in 1973.

Responsibility for the governance, administration, and operation of the community college districts is vested in the local district community college boards of trustees and their staffs. The Illinois Community College Board provides general statewide planning, coordination, and leadership for the public community colleges of Illinois. The ICCB is responsible for statewide studies along with reviewing and approving various requests from the colleges including instructional and public service programs and services, site selections, construction projects, and state financial support.

Each public community college is expected to offer a comprehensive program of services for the residents of its district who have completed high school or are eighteen years of age and older and who can benefit from one of the programs or services of the community college. However, the community college may offer specialized programs for persons of less than eighteen years

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*Approved by the Illinois Community College Board September 20, 1974. Taken from the ICCB Resource Allocation Master Plan for 1977.

of age in cooperation with local public school officials when the community college can be effectively utilized for such services. The community colleges are encouraged to cooperate in offering certain specialized programs and services on a regional or statewide basis. The community colleges shall not offer programs and services specifically reserved for the university upper-division and graduate levels, but the community college may make its facilities available to the universities to offer such services to the residents of the district.

The community college provides quality education at low cost to the consumer close to home. The community college is designed primarily for commuters, although out-of-district students or students living in remote parts of larger districts occasionally elect to seek residence in the community where the college is located. Another fundamental goal of the public community college system is to provide equal access to educational opportunity for all residents of the state who may benefit from its programs and services.

The community college provides a broad range of educational programs and services working closely with other community agencies and organizations to cooperatively meet the educational needs of the community. Such cooperation in public services brings the community college into contact with local and regional agencies attempting to solve these needs including the elementary and secondary schools, proprietary schools, private and public colleges and universities, governmental units (local, county, state, and federal), business, industry, and agriculture; and various community civic, economic, and social organizations to improve the quality of life in the community.

To fulfill this role the comprehensive community college is expected to be innovative, imaginative, and creative. It is expected to experiment with new methods, new curricula, and new forms of instruction, in addition to the traditional, when the best interests of the individual and the community are to be served. Such innovative and non-traditional approaches may include independent studies, proficiency examinations, credit-by-examination, external degrees, correspondence study, work experience, educational television, auto-tutorial programs, and various other audio-visual methods.

The basic purposes and functions of a comprehensive public community college include the following educational programs and services.

1. Provide the first two years of baccalaureate education consisting of liberal arts, sciences, and pre-professional fields designed to prepare students for transfer to four-year colleges and universities and/or designed to meet individual educational goals.

2. Provide career education including occupational, vocational, technical, and semi-technical fields designed to provide job training, retraining, and/or upgrading of skills to meet individual, local, and state manpower needs.

3. Provide general studies, including preparatory or developmental instruction, adult basic education, and general education designed to meet individual educational goals.

4. Provide community education, including non-credit adult continuing education classes, designed to meet individual educational goals.

5. Provide public service activities of an educational nature which may include workshops, seminars, forums, cultural enrichment, community surveys, facility usage, and studies designed to meet community service needs.

6. Provide student support services designed to reflect the programmatic development and direction of the institution, including, but not limited to, admissions, counseling, testing, tutoring, placement, and special assistance for disadvantaged students.

Community Colleges are in a unique position to offer educational and supportive services to CETA Prime Sponsors. Already in place are the admissions office, counseling services, adult and basic educational programs including developmental reading and individualized instructional services, vocational skill training, and job placement--all matching components of a comprehensive CETA delivery system.

Many Prime Sponsors have contracted with community colleges to provide these services to CETA participants. A number of community colleges have developed creative and innovative approaches to meeting the needs of CETA programs.

History of Community College Operating Finance

In July 1964, the Illinois Board of Higher Education (IBHE) published its first Master Plan. Among other things, this Master Plan set forth the basic framework for development of a public junior college system in Illinois. Its recommendations for financing the operations of the colleges within this system were:

1. "(The) state share (shall) be approximately 50% of the average operating costs of the...system.
2. Shares for individual institutions (shall) be determined by a flat grant of aid and/or an equalization grant based on the relative financial capabilities of the several junior college districts.
3. Tuition (shall) not be charged to any Illinois resident."

The public junior college system came into existence by legislative enactment on July 15, 1965. This legislation established flat rate grant funding as the method by which colleges would be funded. The initial rate was $11.50 per semester credit hour for Class I[1] junior colleges and $9.50 per semester credit hour for Class II[2] junior colleges. These rates and this method of distribution were used during the 74th and 75th biennia, fiscal years 1966 through 1969. (A complete history of community college funding rates, levels, and methods of distribution is included in Table 1.)

Prior to development of a fiscal year 1970 budget request in 1968, an increase in the flat rate grant was recommended by the Illinois Junior

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[1]Class I public junior colleges were those which were either formed under the Illinois Public Junior College Act of 1965 or were in existence at that time and met certain minimal population and assessed valuation criteria and which levied a separate tax for junior college purposes.

[2]Class II public junior colleges were those not meeting Class I criteria and not levying a separate tax for junior college purposes. Class II colleges no longer exist.

College Board (IJCB). This budget request was developed on the basis of an increase in the semester credit hour flat grant rate. The IBHE agreed to recommend the total amount generated by the increased flat grant rate but requested that the IJCB develop a formula for distributing this amount both as flat rate grants and equalization grants. Although an equalization formula was developed by the IJCB staff, the Governor agreed to recommend only a flat grant rate increase and asked that equalization be deferred and given further study. Hence, the flat rate grant was continued as the principal source of funding for fiscal year 1970 and was maintained for fiscal year 1971.

During the fall of 1969 the IBHE formed the Advisory Committee on Financing Junior Colleges to give further consideration to financing plans. The Committee's official report was presented to the IBHE in September 1970. Included in the report was a recommendation to amend the apportionment funding method and include equalization along with flat grant funding. The IBHE agreed to the concept, and a plan for funding both on the basis of flat rate grants and equalization grants was adopted by the 77th General Assembly for fiscal year 1972.

In fiscal year 1973 the flat grant rate was increased and, for the first time, an additional amount was funded for each semester credit hour in non-business occupational programs in recognition of the higher cost of such programs. Equalization funding was retained and grants were also provided for the first time for approved public service (non-credit adult education/ community service programs) and disadvantaged student programs.

During fiscal year 1974, flat rate grants and supplemental non-business occupational grants were both increased. For the first time, an amount was also appropriated for instruction of inmates at correctional institutions. Equalization, disadvantaged student, and public service grants continued.

Funds were appropriated for fiscal year 1975 which were intended to produce increases in flat rate grants, supplemental non-business occupational grants, equalization grants, and grants for instruction at correctional institutions. Funding for public service and for disadvantaged student programs was to remain at the same levels appropriated for fiscal years 1973 and 1974.

Because of a dramatic enrollment increase in the spring term of 1975, annual apportionment FTE student enrollments increased from approximately 117,000 to nearly 141,000; therefore, a supplemental appropriation was sought to allow apportionment claims to be paid at the prescribed rates. However, since the amount needed was approximately $16 million and since a supplemental appropriation provided just over $10 million, the flat grant payments had to be prorated, marking the first time community colleges had not been funded at the full rates upon which the appropriation was based. Because of a deficiency appropriation, supplemental non-business occupational and equalization grants were paid at the prescribed rates. Other grants were unaffected by proration.

In recognition of variable costs of different programs, variable credit hour grant rates were provided for the first time for baccalaureate, occupational, and general studies programs in fiscal year 1976. Supplemental non-business occupational, equalization, public service, disadvantaged student, and correctional institution grants continued as special categorical grants. However, since the appropriation was based on an anticipated FTE enrollment of 145,000 and enrollments reached nearly 170,000 and since no deficiency appropriation was approved, claims had to be severely prorated as shown on Table 1.

Early in 1974 the IBHE appointed a committee to study public community[3] college financing in Illinois. This "Blue Ribbon" Committee met for eleven months and published a report of its findings and recommendations in May 1975. Its recommendations were to revise the present financing plan and provide funding as follows:

1. 100% of the difference between (a) the statewide average local tax, tuition, and other revenue (called a standard local contribution); and (b) the estimated cost per credit hour of courses in the following seven categories:

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[3]The term "community" replaces "junior" by legislative enactment beginning with fiscal year 1974 (July 1, 1973).

- baccalaureate oriented
- business, public service, and personal services
- data processing and commerce technologies
- natural science and industrial technologies
- health professions
- review of vocational skills
- remedial/developmental

2. 50% of the difference between the "standard local contribution" and the estimated cost per semester credit hour for an eighth category called "other general studies."

3. No direct state funding for the other 50% of the cost of the "other general studies" courses referred to in #2 above nor for public service courses and research activities, however providing indirect funding by reducing the "standard local contribution" through application of a tax rate 1¢ lower than the median rate, thereby raising the state support level.

4. Continue equalization funding but calculate it based on the inability of local districts to obtain the "standard local contribution" by application of an average tax rate to their assessed valuation per student.

5. Continue funding for disadvantaged students but designate this funding for educationally disadvantaged. (However, IBHE budget recommendations for fiscal year 1977 were based on continuation of funding based on economic disadvantagement.)

6. Discontinue funding for public service grants, supplemental non-business occupational grants, and grants for instructional programs at correctional institutions.

7. Colleges should be granted legislative authority to levy an amount up to 17.5¢ in the education fund and 5¢ in the building-maintenance fund without local referendum.

In response to the "Blue Ribbon" plan, variable credit hour grants were provided in fiscal year 1977 for eight separate instructional categories as follows:

1. Baccalaureate and Academic
2. Business, Public Service, Personal Services
3. Data Processing, Commerce Technology
4. Natural Science, Industrial Technology
5. Health Technology
6. Vocational Skills
7. Remedial/Developmental
8. Other General Studies

The appropriation bill for fiscal year 1977 also included a provision for the first time that enrollment growth would be funded at 70% of the credit hour grant rates. While equalization and disadvantaged student grants were continued, public service and correctional grants were discontinued.

Following the general concepts of the "Blue Ribbon" funding plan, credit hour grant funds were appropriated for fiscal year 1978 to again be distributed by eight different rates for the eight instructional categories utilized in fiscal year 1977. However, the difference was that funds were provided to fund 100% of the difference between the statewide average unit cost and the standard local contribution in category #8 instead of 50% as in fiscal year 1977. In addition, equalization and disadvantaged student grants were continued as the only kinds of special categorical grants.

The fiscal year 1978 appropriations bill divided the credit hour grants into two separate line items, one for "basic" credit hour grants and the other for "special basic" credit hour grants. This separation was made because many of the legislators felt that because of unexpected additional local tax revenues the amount of state "basic" credit hour grant funds should be reduced. However, a separate and additional amount was provided for "special basic" credit hour grants to compensate for previous state funding deficiencies. Funding continued for equalization and disadvantaged student programs.

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ILLINOIS COMMUNITY COLLEGE BOARD
SELECTED DATA OF ILLINOIS PUBLIC COMMUNITY COLLEGES

Community College Districts in 1976-1977

Locally Governed Districts	38
State Governed Districts	1
Single-Campus Districts	35
Multi-Campus Districts	3
Black Hawk District	2
Chicago City Colleges District	9
Illinois Eastern Community Colleges District	4

Number of Community Colleges

1965	1965-66	1966-67	1967-68	1968-69	1969-70	1970-71	1971-72	1972-73	1973-74	1974-75	1975-76	1976-77
23	27	28	34	40	43	46	46	47	47	48	49	51

TOTAL NUMBER OF CITIZENS SERVED IN CREDIT AND NON-CREDIT CLASSES BY COMMUNITY COLLEGES

	1965-66	1966-67	1967-68	1968-69	1969-70	1970-71	1971-72	1972-73	1973-74	1974-75	1975-76	1976-77
Fall Enrollment	66,217	70,606	83,360	100,595	144,249	169,961	178,005	211,553	265,533	335,062	512,091	519,232
% Increase From Previous Year	--	7%	25%	14%	43%	18%	5%	19%	25%	26%	53%	1.4%

Opening Enrollments in Instructional Areas, Fall Terms	1972	1973	1974	1975	1976
Total Instructional Headcount	185,328	226,101	257,365	311,181	325,830
Baccalaureate-Oriented	67,460	85,360	95,942	108,025	107,054
Career-Occupational	53,831	69,298	72,943	100,171	108,325
Other Studies	20,313	59,732	72,414	89,821	85,167
Undeclared	43,724	11,711	16,066	13,164	25,284
Full-Time Students	74,226	81,396	78,865	100,724	95,141
Part-Time Students	111,102	144,705	178,500	210,454	230,689
Total Full-Time Equivalent (FTE) Students	108,637	114,265	124,392	156,883	154,001
In-District Students	170,890	210,492	245,067	299,285	308,819
Out-of-District Students	13,714	14,907	9,989	11,192	16,350
Out-of-State Students	724	702	2,309	704	661
Participants in Community Education & Comm. Svc. Offerings	26,225	39,432	78,237	195,215	193,402

Unit Costing Data Instructional Cost/Student Credit Hour	1971-72	1972-73	1973-74	1974-75	1975-76
Baccalaureate-Oriented	$45.03	$48.33	$50.60	$51.69	$49.77
Occupationally Oriented	55.35	57.64	56.38	57.89	54.75
General Studies	50.03	45.59	45.54	40.49	39.57
Adult & Continuing Education	48.48	*	*	*	*
STATE AVERAGE	$48.05	$50.61	$52.24	$51.19	$48.84

Operating Revenue	FY1975 Audited		FY1976 Audited		FY1977 Budgeted	
Local Taxes Including Chargebacks	$ 78,629,497	37%	$ 83,902,358	35%	$ 82,173,000	35%
State Apportionment and Other State Funds	80,599,519	38%	89,079,141	39%	101,342,000	43%
Federal Funds	4,854,352	2%	5,000,416	2%	1,678,000	1%
Student Tuition	37,577,319	18%	47,602,475	21%	46,041,000	19%
Other Sources	9,217,008	5%	4,923,038	2%	5,325,000	2%
TOTAL REVENUE IN 37 DISTRICTS	$210,877,695	100%	$230,507,428	100%	$236,559,000	100%

Total Operating Revenue for Fiscal Years 1970-76

FY70 (Audited)	FY71 (Audited)	FY72 (Audited)	FY73 (Audited)	FY74 (Audited)	FY75 (Audited)	FY76 (Audited)	FY77 (Budgeted)	FY78 (Projected)
$130,573,319	$138,916,047	$143,710,936	$170,931,633	$201,603,002	$210,877,695	$230,507,428	$236,559,000	$268,200,957

State Funds for Community Colleges from ICCB

	FY70 (Actual)	FY71 (Actual)	FY72 (Actual)	FY73 (Actual)	FY74 (Actual)	FY75 (Actual)	FY76 (Actual)	FY77 (Estimated)
Apportionment FTE	75,037	90,163	102,477	109,484	117,136	140,983	169,920	176,723
Credit Hour Rate Paid	$15.50	$15.50	$15.50	$16.50	$18.50	$18.12	$16.15	VARIABLE
Apportionment Dollars	$34,747,689	$41,925,251	$47,638,799	$54,188,598	$65,010,565	$76,638,460	$82,357,165	$95,934,500
Vo-Tech Supplement	--	--	--	1,530,000	3,340,000	4,347,994	4,640,000	-0-
Equalization	--	--	1,050,000	1,200,000	2,220,000	3,149,679	3,099,821	6,118,500
Disadvantaged	--	--	--	1,400,000	1,400,000	1,400,000	2,443,536	2,708,400
Public Service	--	--	--	750,000	750,000	750,000	705,000	-0-
Correctional Inst.	--	--	--	--	78,600	100,000	117,500	-0-
Initial Grants	--	--	300,000	100,000	100,000	200,000	-0-	-0-
Sub-Total--Class I	$34,747,689	$41,925,251	$48,988,799	$59,190,598	$72,899,165	$86,586,113	$93,363,022	$104,761,400
SCC E. St. Louis	750,000	2,131,300	2,396,900	2,879,500	3,205,780	3,205,800	3,267,100	3,389,300
ICCB Office	280,810	328,100	402,137	405,686	598,256	576,775	662,400	668,900
Total Operating	$35,778,499	$44,384,651	$51,787,836	$62,475,784	$76,703,201	$90,368,708	$97,292,522	$108,819,600
Il. Bld. Auth. (IBA)	19,154,170	20,896,365	23,385,995	14,121,770	12,607,110	12,607,110	12,607,110	12,607,110
St. Univ. Ret. Sys.	3,172,500	4,093,400	3,200,000	3,200,000	614,100	2,409,800	3,478,400	5,061,300
Total State Funds	$58,105,169	$69,374,418	$78,373,831	$76,597,554	$89,924,411	$105,385,618	$113,378,032	$126,488,010 (SB-1650 as amended)

NA - Not Available

* Adult and Continuing Education course credit hours are included in General Studies. Non-credit activities are offered under Public Service-Community Education.

-- Did not exist.

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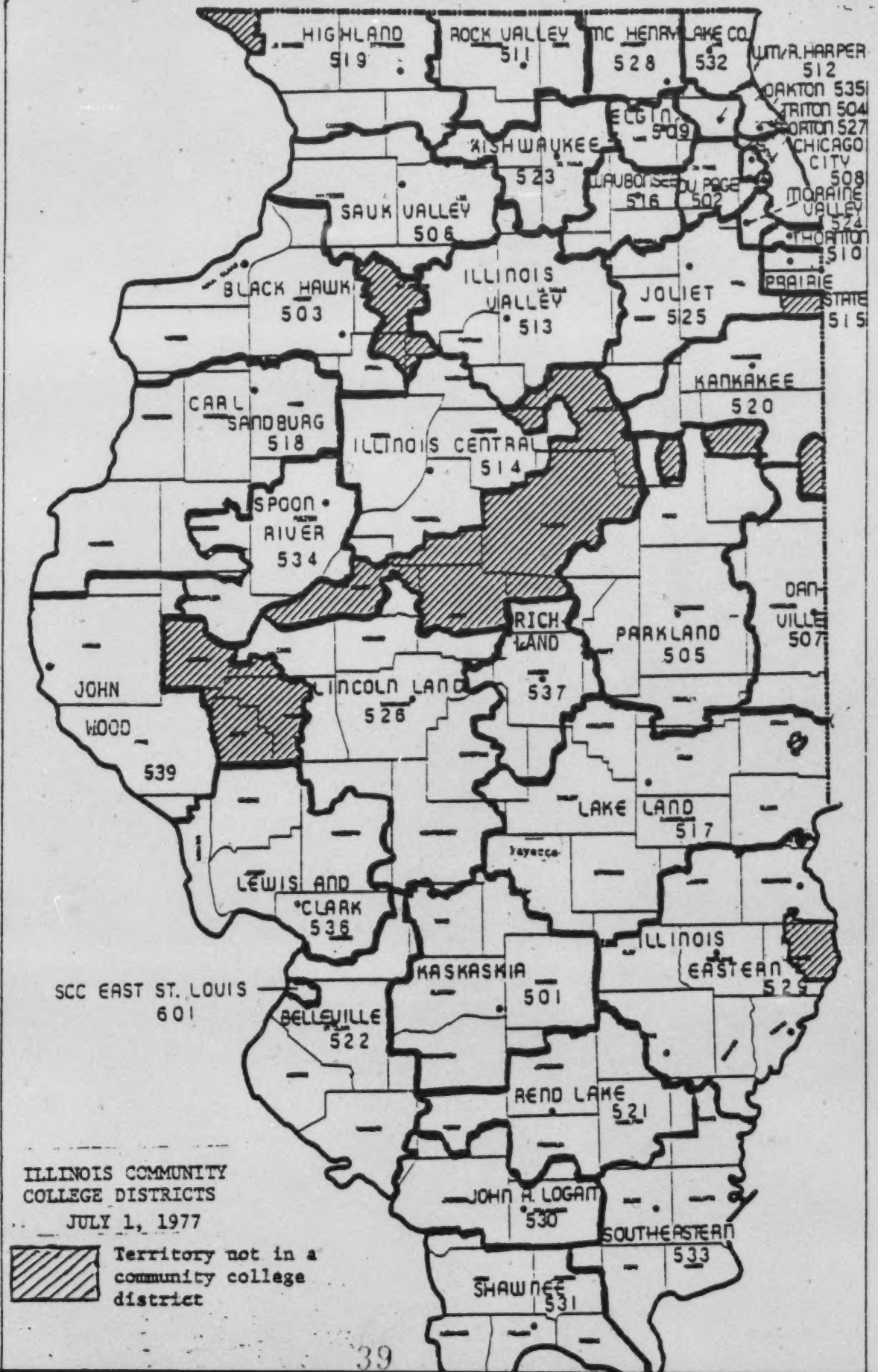

HIGHLAND 519
ROCK VALLEY 511
MC HENRY LAKE CO. 528
532
WM. R. HARPER 512
OAKTON 535
TRITON 504
MORTON 527
CHICAGO CITY 508
ELGIN 509
KISHWAUKEE 523
WAUBONSEE 516
DU PAGE 502
MORAINE VALLEY 524
THORNTON 510
PRAIRIE STATE 515
SAUK VALLEY 506
BLACK HAWK 503
ILLINOIS VALLEY 513
JOLIET 525
KANKAKEE 520
CARL SANDBURG 518
ILLINOIS CENTRAL 514
SPOON RIVER 534
DAN-VILLE 507
RICH LAND 537
PARKLAND 505
JOHN WOOD 539
LINCOLN LAND 526
LAKE LAND 517
Wayecca
LEWIS AND CLARK 536
ILLINOIS EASTERN 529
KASKASKIA 501
SCC EAST ST. LOUIS 601
BELLEVILLE 522
REND LAKE 521
JOHN A. LOGAN 530
SOUTHEASTERN 533
SHAWNEE 531
ILLINOIS COMMUNITY COLLEGE DISTRICTS
JULY 1, 1977
Territory not in a community college district

Community College	CETA Contact Person
Kaskaskia	Bob Swetland
DuPage	Dr. Robert Seaton
Black Hawk	
Black Hawk Q.C.	Otto Schweinberger/Guadalupe Reyes/Herman Brant
Black Hawk East	Constance M. Herrick/Dale E. Swanson
Triton	Patricia Janes
Parkland	Clifton Matz
Sauk Valley	John Sagmoe
Danville	Maurice F. Stauder
Chicago City	Bernard M. Ferreri
Kennedy-King	
Loop	
Malcolm X	
Harry S. Truman	
Olive Harvey	
Southwest	
Wilbur Wright	
Skills Center	
City-Wide Inst.	
Elgin	Dennis Sienko/Dr. Lynn H. Willett
Thornton	Dr. Norma Rooney
Rock Valley	Patrick P. Thompson
Wm. Rainey Harper	Robert Cormack/Shirley Joyner
Illinois Valley	Dr. Charles Novak/Frances J. Zeller
Illinois Central	Pam Hoekstra/Dr. Roy Wright
Prairie State	Dr. Anthony Torres/Richard B. Jensen
Waubonsee	Ken Shibata/Lee Thompson/Edward Fauth
Lake Land	Roger Barry
Carl Sandburg	Dr. William D. Masters
Highland	James Berberet/Gene Wagner
Kankakee	Dr. David L. Ferris
Rend Lake	Ardell Kimmel
Belleville	Dr. William Keel, President
Kishwaukee	Jeanette Crum/Jan Wiseman
Moraine Valley	Joan Schmidt/Glen Gabert
Joliet	J. D. Ross
Lincoln Land	Orell Vanderwater
Morton	Jerry W. Smith/Daniel Hochstetter
McHenry	Pete Stuckey
IL. Eastern	Jesse Keyser/Kenton Peak
Lincoln Trail	
Olney Central	
Wabash Valley	
Coll. w/o Walls	
John A. Logan	Bob Irvin/Carl Planinc/Jack Hill
Shawnee	Joel Jennings
Lake County	Harold Garner/Rosemary Moody
Southeastern	Harold Mills
Spoon River	Patrick Burke
Oakton	Kathleen Arns
Lewis & Clark	Terry Cross/Joseph Pukach/J. D. Schweitzer/C. Van Hoy
Richland	Robert Rose
John Wood	James Selby
SCC E. St. Louis	Willard Maytubby/Willie Walker/Rogers Conner

PART III

CETA FIVE PERCENT (5%) VOCATIONAL EDUCATION IN ILLINOIS

Under the Comprehensive Employment and Training Act (CETA), the Federal Department of Labor provides the Governor of each state with funds specifically for supplemental vocational education. These funds are often referred to as "5% funds" because they are five percent of the state's CETA Title I dollars. These funds are available for use in each local prime sponsor area and are to supplement, and complement, the prime sponsor's regular Title I program.

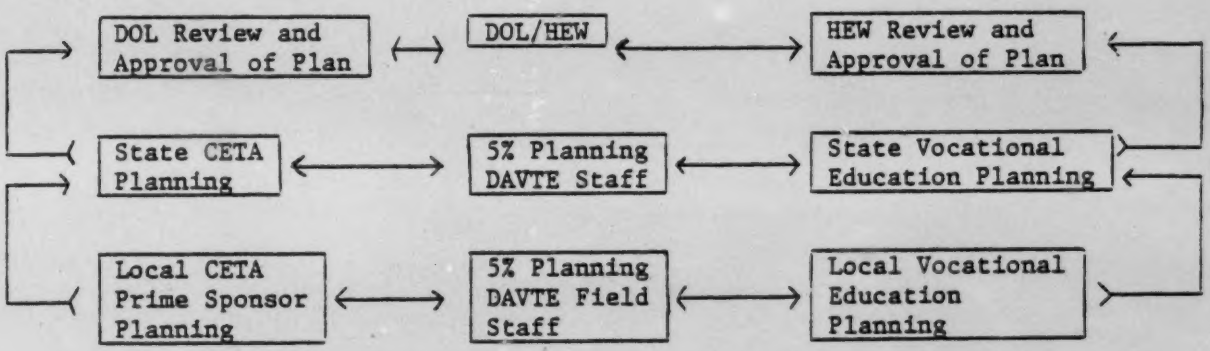
The five percent funds represent an extention of vocational education funds provided under the old Manpower Development and Training Act (MDTA). Consequently, most of the programmatic effort of the five percent funds has been traditional training and services as provided under MDTA. This was due to many factors: in a matter of a few months CETA prime sponsors, many of them new to the manpower arena, were writing grants for a Summer Youth Program, a Title I program, and a Title II program. The dust hardly settled when a new Title VI program began. In addition to writing grants, of course, there was the matter of program implementation. "Supplemental" funds available to prime sponsors became of secondary importance relative to the much larger Title I, II, and VI grants. Five percent programs took a backseat. Another factor was a federal mandate requiring continuity of services to clients who were in training programs funded under MDTA.

It was quite logical then, considering these variables, that many prime sponsors chose, at least initially, to maintain and continue traditional MDTA training and services under CETA five percent money.

There is nothing inherently wrong in the use of five percent funds for traditional training and services. In Illinois, however, the five percent funds are viewed as having a much greater significance and possible impact than providing mere training and services. One of the historical shortcomings of the traditional manpower programs is their failure to relate programmatically to mainstream vocational education program. Although a marriage took place at the federal level between DOL and HEW, it was not

recognized at the State and local level. GOMHD attempted to implant the idea that five percent funds can be the catalyst for closer coordination between regular vocational education and CETA training and services.

A further extension of this concept is that a closer integration between CETA and regular vocational education should occur at the planning level and be decentralized to the local level of planning and program implementation. This is depicted as follows:


DOL Review and Approval of Plan
DOL/HEW
HEW Review and Approval of Plan
State CETA Planning
5% Planning DAVTE Staff
State Vocational Education Planning
Local CETA Prime Sponsor Planning
5% Planning DAVTE Field Staff
Local Vocational Education Planning

The Illinois Office of Education, Department of Adult Vocational and Technical Education (DAVTE) was designated the administrative agency for this grant.

Throughout the process of five percent funding, the personnel from DAVTE provide an exchange of information between CETA prime sponsors and local vocational educational programs allowing each to blend into the other.

This is a goal in Illinois, and once attained it is felt it will result in vocational education/CETA programs providing better services to the participant at lower costs through coordinated planning and the elimination of identical, and often duplicative program efforts.

The implementation of five percent CETA vocational education activities in Illinois highlights some of the linkages developed at the State level.

The purpose of the CETA Vocational Education (5%) funds is to accentuate the similarities between traditional and CETA vocational efforts, and to assist the process of interagency coordination at the State and local level. Illinois effected such coordination and cooperation in 1974, when CETA began, and has nurtured and developed it over the past three years.

The State Board of Vocational Education assisted GOMHD in developing Non-financial Agreement (NFA) guidelines and review criteria. An important part of an agreement was a clear indication that the five percent funds were to be used to enhance the regular prime sponsor Title I program.

The development of NFA's parallel the development plans, but often receive lower priority by prime sponsors than GOMHD would have liked. Nevertheless, through much staff assistance from DAVTE, we feel that the NFA's are working documents which guide both prime sponsors and DAVTE in implementing five percent programs.

The Department of Adult, Vocational and Technical Education (DAVTE) as the administrative agent for the five percent funds has the responsibility to:

- negotiate a non-financial agreement (NFA) with each prime sponsor and modifications thereto as appropriate;
- develop local training contracts with putlic and private institutions in accordance with approved NFA's, and monitor each contract;
- establish and maintain a fiscal and program reporting system adequate to meet federal, CETA reporting requirements;
- provide a payment mechanism between DAVTE and local training agencies in accordance with signed contract; and
- assist prime sponsors in developing vocational programs under CETA.

DAVTE maintains a staff of field consultants working with prime sponsors and training institutions on an almost daily basis. This detailed involvement with the program facilitated proper program management and monitoring.

The 5% funds have been important to Illinois. They have been instrumental; in fostering good relationships between local prime sponsors and the Governor's Office of Manpower and Human Development; in pointing out the resources of the educational agencies to CETA personnel and; in opening, slowly, the doors of communication between educators and CETA clientele. Also, the cooperation and coordination of CETA and vocational education, as mandated by CETA, is becoming a reality.

Many community colleges have students enrolled in their regular classes under the 5% DAVTE vocational education funds. Through a non-financial agreement or contractual arrangement with the local prime sponsor, tuition, fees, and books may be paid for CETA eligible students on a less-than-class-size basis.

In addition to the above arrangement, a prime sponsor may contract with a community college to develop a special class for CETA participants in any given vocational education program or adult, basic education program. Total costs of such classes may be charged to the prime sponsors. However, no state apportionment funds shall be provided for any course which the district receives 50% or more of Federal financing or financing from state sources other than through the ICCB, or both.

COMPREHENSIVE TRAINING SECTION

GENERAL INFORMATION

Section Policy and Procedures	Delmar Slagell	(217) 782-4862
Chicago CETA Programs	Athie Garrison	(312) 793-2708
Downstate CETA Programs	Bill Grove	(217) 782-4862

PRIME SPONSORS

Cook DuPage Kane-DeKalb Lake McHenry Will-Grundy Winnebago-Boone (Rockford)	Linda Calafiore Chicago (312) 793-2708	
East St. Louis Madison-Bond Sangamon-Cass St. Clair-Washington-Perry	Jack Kraushaar Springfield (217) 782-4862	
Rock Island	Omar Mumey Springfield (217) 782-4862	
Union-Johnson-Alexander-Pulaski-Massac (Shawnee)	Nancy McIlvoy Springfield (217) 782-4862	
Champaign-Ford-Iroquois-Piatt (Champaign) LaSalle Macon McLean Peoria Tazewell	Martha Wolff Springfield (217) 782-4862	
Chicago	Athie Garrison Robert Bonner Grady Gilkey Robert Hale Gary Lonquist	Chicago (312) 793-2708

PRIME SPONSOR

Balance of State

Region 1	Jo Daviess-Stephenson-Carroll-Ogle-Whiteside-Lee	Omar Mumey
Region 2A	Kendall	Springfield
Region 3	Bureau-Putnam-Marshall-Stark	(217) 782-4862
Region 4	Henry-Mercer	
Region 5	Henderson-Warren-Knox-McDonough-Fulton	
Region 6	Woodford-Livingston	
Region 8K	Kankakee	
Region 12	Hancock-Schuyler-Adams-Brown-Pike	
Region 8V	Vermilion	Nancy McIlvoy
Region 9	Douglas-Coles-Cumberland-Edgar-Clark	Springfield
Region 13	Monroe-Randolph	(217) 782-4862
Region 14	Effingham-Fayette-Marion-Clinton	
Region 15	Clay-Crawford-Jasper-Lawrence-Richland	
Region 16	Wabash-Edward-Wayne-White	
Region 17	Jackson-Franklin-Jefferson-Williamson	
Region 19	Saline-Gallatin-Hamilton-Pope-Hardin	
Region 10	Shelby-Moultrie	Jack Kraushaar
Region 11	Mason-Menard-Logan-Morgan-Scott-DeWitt	Springfield
Region 11A	Greene-Jersey-Calhoun-Macoupin-Christian-Montgomery	(217) 782-4862

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PART IV

STEPS IN THE PROCESS OF APPLYING FOR CETA FUNDS FROM A PRIME SPONSOR

There are nine major steps that should be followed when applying for CETA funds from a prime sponsor. They are:

1. Find out who your prime sponsor is;
2. Find out who the prime sponsor's CETA planner is;
3. Make an appointment to talk with the planner;
4. Talk with the planner;
5. Become familiar with CETA in your area;
6. Find out the CETA funding process for your area;
7. Determine the method for submitting your funding application;
8. Complete and submit you application; and
9. Be visible and active on a year-round basis.

Step 1 - FIND OUT WHO YOUR PRIME SPONSOR IS.

In order to apply for CETA funds, the first step is to determine the agency and location for the CETA prime sponsor in your area. To do this, call or write the State Manpower Services Council (SMSC) for your State. A list of Illinois Prime Sponsors is in Part 1 of this handbook. There are three possibilities. Your area will be covered by either a local, city, or county prime sponsor, by a consortium prime sponsor, or by a balance of State prime sponsor. Ask the SMSC for your prime sponsor's name, address, and telephone number.

Step 2 - Once you have this information, call the prime sponsor and FIND OUT WHO THE PRIME SPONSOR'S CETA PLANNER IS.

The CETA planner (or manpower planner) is the key person with whom you will need to deal. Every prime sponsor has identified one or more persons as the planner. This person is generally the major source of CETA information for the prime sponsor. In many instances, the planner will have additional responsibilities other than planner. Also, many planners are administrators and/or decision makers for the CETA program as well. Thus, it is extremely important to get to know and keep in general contact with this person.

Step 3 - You should then MAKE AN APPOINTMENT TO TALK WITH THE PLANNER as soon as possible.

If your prime sponsor is a local one, you will very probably talk directly with the planner. If your prime sponsor is a consortium or balance of State, you may be instructed by the planner to talk with a designated person in your local jurisdiction rather than directly with the planner. This depends entirely on your prime sponsor's administrative structure, and the planner will know the proper method for access to the prime sponsor.

You should then state that the purposes of the requested meeting are: (a) to introduce your agency to the planner (if this has not been previously done), (b) to determine the prime sponsor's funding cycle, (c) to inquire about the present CETA programs being funded, and (d) to discuss future funding possibilities.

Step 4 - The next step is to TALK WITH THE PLANNER about the four areas mentioned in Step 3.

In introducing your agency to the planner, you should describe its purpose, size, and functions and activities. Prime sponsors are required by the CETA legislation to serve those members of the community who are unemployed, underemployed, and/or economically disadvantaged. In order to accomplish this, prime sponsors should work with local agencies and groups representing those target groups (called "significant segments" in CETA terminology). Therefore, you should present your agency in those terms to the planner: how you intend to or already are serving those target groups.

The first consideration in determining your next action is the prime sponsor's timetable for making the Fiscal Year funding decisions. This will generally be based on two factors: (a) the prime sponsor's fiscal year or program year dates[1], and (b) the date that funding applications are due in to the prime sponsor.

The next consideration is the present funding amount for CETA in your community. The planner can make a list of services and program operators available to you. This information can help you to draw up a realistic proposal and avoid wasted effort. For example, your organization may have considered requesting funds to set up a comprehensive counseling center. You may find out that such a center already exists. In this case, you may decide that your proposal should concentrate on providing additionally needed services to the existing center.

When you have a specific fudning request in mind, this would be an excellent time to discuss it with the planner. You should decide your funding request both in the general terms of what you want funded and why; in the specific terms, if you have them, of dollars required; the exact types of service to be provided; the significant segments (target groups) you will serve and; other pertinent information. You should also discuss a realistic dollar figure for your proposal with the planner.

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[1]It is important to determine the prime sponsor's fiscal year and funding cycle dates. The Federal Government's fiscal year will start October 1 and end September 30.

Probably the most important part of this discussion is why you want to receive CETA funds. It is critical to establish the need to obtain funding since the prime sponsor must justify the funding requests made to the Department of Labor in terms of meeting the communities' employment and training needs. Therefore, if you can demonstrate to the prime sponsor the extent to which you will be serving the unemployed, underemployed, and/or disadvantaged through your funding proposal, you will be that much ahead in the process. One of the most effective ways to accomplish this is through the use of statistics. If you have difficulty gathering this information, the planner should be able to provide you with assistance. Generally, you should find detailed demographic data, income data, education levels, labor force information, and skill shortage information to support your funding request. You should also ask the planner for any additional information required. It will be extremely useful if you become familiar with data sources and the most effective methods of utilizing them.

Step 5 - After you have had this preliminary introduction to CETA and to the CETA planner, you should BECOME FAMILIAR WITH CETA IN YOUR AREA.

Since CETA is becoming more integrated into the local governmental structure, it generally facilitates your ability to work with CETA if you know how to work with the political system of which CETA is a part. This includes:

a. Determining the role of the prime sponsor's Manpower Planning Council[2] in the CETA decision making process and possible inputs at that level. You should determine whether or not the Council considers funding requests. If it does, you should then determine the methods for making your requests known. The planner can help with this and can also furnish the name of the chairperson of the Council.

[2]Each prime sponsor is required to establish a Manpower Planning Council made up of community representatives to advise and make recommendations to the prime sponsor concerning CETA activities.

b. Determining CETA's role in the general budget cycle for your prime sponsor's governing body (for example, city council or county board) and possible inputs you can have in that process. This may mean appearing at public hearings and by other means of directly making your views and needs known to the decision makers.

c. Acquainting yourself with the overall role of the governing body for your jurisdiction and possible inputs at this level. For example, if the governing body publishes agenda in advance of public meetings, you should ask to be put on a mailing list if there is one, or find where you may obtain agenda copies. You should also find out how CETA is listed on such agenda--whether by name, or as "manpower activities", "community services", etc. This sometimes varies even within the jurisdiction itself, depending on the particular aspect of CETA being discussed.

Step 6 - In order to have specific input, you should FIND OUT THE CETA FUNDING PROCESS FOR YOUR AREA.

Once again, the planner would be your key contact for this information. There are many variations of funding methods used by prime sponsors. Some fund programs only once a year, others fund incrementally throughout the year. Some have a contingency fund in the event new proposals are brought to their attention.

In addition to these variations, prime sponsors have many ways of requesting funding proposals from their communities. Some prime sponsors issue requests for proposals (RFP) and follow a formal RFP procedure. In this case, they usually issue either specific RFP's in which they are seeking a program operator(s) for a predetermined program or service to be provided, or they may issue a general RFP which solicits proposals that have a broader scope. Some prime sponsors may utilize a public hearing process at which all agencies that request funding state their proposals. Other prime sponsors may accomplish

this by a presentation to the governing body. If you ask to have your agency put on the solicitation source list, or other appropriate means to receive funding requests the prime sponsor utilizes, as well as determine exactly how and when the funding system works, you can probably have a more effective input on this process.

Step 7 - After you find out the methods and schedules for funding, you should DETERMINE THE METHOD FOR SUBMITTING YOUR FUNDING APPLICATION.

This, of course, depends on the information previously obtained. The most important consideration is to follow the prime sponsor's guidance in this area. However, you should be aware of your other options as well. Generally, there will be four ways to submit proposals: answer an RFP, prepare a presentation to be made at a public hearing, submit an unsolicited proposal[3], and make a direct presentation to the governing body for your jurisdiction.

Step 8 - After you know which method you will use, you should then COMPLETE AND SUBMIT YOUR APPLICATION.

The two most important considerations here are timeliness and thoroughness. Your request should build from the justification for funding based on fulfilling a community need to serve unemployed, underemployed, and/or disadvantaged significant segments and continue from there. Also, the prime sponsor will very probably provide you with instructions on completing funding applications. If this is not provided go back to the planner and ask.

Step 9 - The final step, Step 9, is BE VISIBLE AND ACTIVE ON A YEAR-ROUND BASIS.

If you are funded, congratulations! If you are not funded, do not give up. Offer any volunteer services to the prime sponsor that your agency

[3]If you miss the cut-off date for submitting applications, if the prime sponsor does not request proposals, or; in any other circumstance in which you want to draw your funding request to the prime sponsor's attention, you may submit an unsolicited proposal to the prime sponsor at any time.

can provide, such as emergency day care for CETA participants. Keep yourself visible and active throughout the year, rather than just at funding time. Contact the agencies that did receive funding to see if there are services you can offer them. Up-date your application and find ways to improve it for the next try. Most importantly, keep in contact with the prime sponsor to see how the employment and training needs of the community are being served throughout the year.

Contracting Process

Prime Sponsors as well as community colleges usually have adopted a standard procedure for entering into an agreement with another agency. With the understanding that each agency may differ in the type of agreement, the kind of items to be included and the degree of specificity needed, this information has been gathered to assist those parties seeking ways to enter into a more formal contractural agreement.

A contract is a two way agreement between two parties. It is important for both the prime sponsor and the sub-contractor to understand the terms of the contract. Although the contract is usually written by the prime sponsor it is equally important for the sub-contractor to review the format and contents of the contract to be sure all the necessary points are covered in order to protect their interests.

The following information is divided into four sections: Basic sub-agreement contents, implementation and administration of sub-grants and contracts, close-out of sub-agreements, and a sample or model contract.

Special Note: Prime Sponsors are provided with the following legal references and technical assistance guides. These publications are referred to throughout the following section. If the prime sponsor refers to the publications as part of the terms of the contract, the publications should be furnished to the sub-contractor.

- Comprehensive Employment and Training Act of 1973, as amended;
- CETA Regulations, 29 Code of Federal Regulations (CFR) Parts 94 through 99;
- Federal Management Circular (FMC) 74-4 (formerly OMB Circular A-87);
- FMC 74-7 (formerly OMB Circular A-102);
- Revised Attachment O to FMC 74-7;
- OMB Circular A-110 (available August, 1976);
- OMB Circular A-95;
- The Federal Procurement Regulations (FPR), Title 41 CFR Chapters 1 and 2;
- Department of Labor Procurement Regulations (DOLPR), Title 41 CFR Chapter 29;
- Equal Employment Opportunity requirements as defined in Executive Order 11246;
- Civil Rights Act of 1964, as amended;
- Hatch Act;
- Federal Fair Labor Standards Act;

- MA Property Handbook No. 303 and/or MA Property Handbook for Contractors;
- State and local procurement and financial rules and regulations;
- Fiscal Activities Guide, Part I;
- Forms Preparation Handbook;
- CETA Audit Guide;
- Program Assessment Guide;
- Manpower Program Planning Guide; and
- Management Information Systems Guide.

Section I: Basic Sub-Agreement Contents

There are generally five parts to a sub-agreement: a signature sheet, a narrative description or work statement, a budget, a participant services schedule, and the general and special provisions (assurances and certifications). This section will describe each part of a sub-agreement and the reasons for including them. An example of a sub-agreement with instructions is found in Section IV. This same basic format can be used for both cost-reimbursement and fixed-price types of sub-agreements. It can also be used for both a sub-grant and a contract.

The most important consideration when the prime sponsor is writing a sub-agreement is that it must contain in clear terms exactly what the prime sponsor wants the sub-grantee or contractor to accomplish, how, and for what cost. If a prime sponsor does not specify in a sub-agreement what the sub-grantee/contractor is to do, the sub-grantee/contractor is under no legal obligation to do it. Also, the prime sponsor may legally have to pay for something that does not meet expectations if safeguards are not built into the sub-agreement. Thus, the sub-agreement becomes a major tool of overall prime sponsor operations.

A. Signature Sheet

Section IV contains two examples of signature sheets. The first is patterned after a signature sheet widely used by the Department of Labor. The second is an example preferred by some prime sponsors since it resembles a format used for purposes other than CETA. The purpose of a signature sheet is to serve as an introduction to and summary of what is contained in the sub-agreement. It also legally binds both signatory parties to the terms of the sub-agreement once the prime sponsor's and the sub-grantee's/contractors' authorized representatives have signed it. If the sub-agreement is modified, a new signature sheet needs to be attached to the modification stating the changes included in the modification.

The basic elements of a signature sheet are:

1. Name and addresses of the signatory parties;
2. Period of performance of the sub-agreement;

3. Total sub-agreement costs;
4. Purpose of the sub-agreement;
5. Type of sub-agreement; and
6. Signatures of the authorized officials of the signatory parties to the sub-agreement.

B. Narrative Format (Work Statement)

The purpose of the narrative, or work statement, in a sub-agreement is to have the sub-grantee/contractor specifically describe the services and/or supplies to be delivered under the sub-agreement terms. The most important consideration of the work statement is that it should provide for performance standards that the sub-grantee/contractor will be required to follow. Such performance standards should be stated as measurable objectives to the extent possible, so that performance quality can be determined on quantifiable bases. The use of measurable objectives is an excellent method to check the sub-agreement's progress. Measurable objectives can also be utilized as a basis for monitoring and evaluating the sub-agreement as well as assuring performance in the manner the prime sponsor wishes. If specific performance standards are not included in the work statement, it will prove extremely difficult to achieve performance compliance.

Generally, a narrative or work statement should include the following:

I. Program Goals,
II. Target Population.
III. Types of Services and Activities - The narrative (work statement) would include a description of the specific activities in the sub-agreement.
   A. Classroom Training
   B. On-The-Job Training (OJT)
   C. Work Experience (WE)
   D. Public Service Employment (PSE)
   E. Supportive Services
   F. Manpower Services
   G. Allowance Payment System

IV. Determination of Costs

V. Performance Standards--Measurable Objectives

VI. Management Plan

A. Staffing

B. Fiscal Accountability

C. Administration

D. Property and Facilities

E. Reports Required--Management Information System (MIS)

F. Equal Employment Opportunity

G. Grievance Procedure

VII. Coordination and Linkages

The following is a suggested narrative outline describing the above topics:

I. Program Goals - The basic goals that the sub-grantee/contractor intends to achieve, such as enabling members of a particular target group to obtain particular occupational skills, should be clearly stated in the narrative.

II. Target Population - Identify by age, race, sex, and/or any other demographic characteristics the target population (significant segments) to be served by this program.

A. Describe the outreach and recruitment effort that will be made to reach the target population identified (essentially, who is responsible for what);

B. Describe the selection process to be used in this program--what selection criteria will be used and what weight will be given to each; and,

C. Describe the methods used to determine CETA eligibility of applicants.

III. Types of Services and Activities - This section of the narrative should describe in detail the activities or services that will be provided in the sub-agreement; classroom training, OJT, work experience, PSE, supportive services, manpower services, or any combination. For any activity, specify who is responsible for wage or allowance payments to participants; who provides services and job placement; under what conditions a participant may be terminated and; who keeps what participant records, etc.

A. Classroom Training

1. Skills Training

a. List the occupations in which training will be conducted. Give the duration of training, number of participants in each course, total cost, cost per participant for each, whether open entry-open exit will be utilized, and how participants will be assigned to specific courses.

b. Briefly describe the training methods to be used for each course. Include curriculum outlines.

c. Indicate the sources of information used to determine the curriculum outline and the relation of the curriculum to the skills needed in an actual work situation.

2. Basic and Remedial Education

a. Describe the content of any basic or remedial education courses planned.

b. State the duration of each course, number of participants, total cost of each course, cost per participant, and the method used to determine which participants will receive remedial courses.

c. Include a course outline for each course planned.

B. On-The-Job-Training (OJT)

1. List the occupational areas and training outlines in which OJT will be conducted.

2. Describe the method of determining reimbursement for extraordinary training costs.

3. State the goals of the OJT program: permanent employment training site only, or a combination depending on the number and kinds of OJT occupations.

C. Work Experience

1. Describe the outcomes expected from the work experience component. Specify the duration of the activity.

2. Indicate the types of work sites and occupational areas that will be funded.

3. Give the compensation levels and methods of compensation determination to be provided work experience participants.

D. Public Service Employment (PSE)

1. Present a justification for funding PSE with Title I funds: unmet public service needs of the community; unemployment situation; budgetary crises, etc.

2. Describe the PSE jobs to be filled and include a completed PSE Occupational Summary Form and Program Summary Form (See Forms Preparation Handbook for sample forms and instructions and furnish to sub-contractor).

3. State the goals of PSE: transition to unsubsidized employment; utilized as a form of OJT; meeting the community's needs, etc.

4. Provide a description of the methods to be utilized to meet the CETA legislative and regulatory requirements concerning PSE.

E. Supportive Services

1. List the supportive services to be provided in this program. Include costs for each; number of participants to receive each, unit cost of each; how the services will be provided, and by whom.

2. Describe how the services will enable individuals to obtain or retain employment.

3. Describe how participants will be assigned to each service.

F. Manpower Services

1. List the manpower services to be provided in this program. Include costs for each; unit cost; number of participants to receive each; and who will provide each service.

2. Describe how each manpower service will be organized and integrated with the rest of the program. This may include staffing charts and flow diagrams.

3. Describe the operations and results expected from each activity.

G. Allowance Payment System

Describe the amounts of allowance payments; the methods for determining allowances to be paid to participants; the method of verifying welfare and unemployment insurance payments to participants; the method for accomplishing the payment of allowances; the method for detection and collection of unauthorized payments and over-payments.

IV. Determination of Costs - Give a specific explanation of how costs were determined, both overall and by categories. If administrative costs are included, give a justification for those costs and the method for determining such costs.

V. Performance Standards--Measurable Objectives - Delineate the specific program objectives for each activity. Include quantitative checkpoints of progress both by dates and results and a detailed implementation schedule. Also indicate levels of proficiency (where appropriate) and expected outcomes of participants at the end of each activity.

VI. Management Plan

A. Staffing - Include job descriptions and resumes of vital staff (such as instructors in skill training).

B. Fiscal Accountability - Specify what method of payment by the prime sponsor is needed (i.e., actual cost reimbursement, cost per training hour, payment for successful completion, etc.). Describe the accounting system and fiscal reports and controls that will be used to safeguard program funds. Describe how the requirement for reporting expenditures on an accrued basis will be fulfilled.

C. Administration - Present an organization chart or written description outlining the administrative structure of the sub-grantee's/contractor's agency. If administrative costs are included in the sub-agreement, indicate which portions of the administrative structure will be paid from prime sponsor funds.

D. Property and Facilities - Specify facilities to be used and their cost. A list of property to be rented, leased, or purchased should be attached along with property costs and an inventory of property on hand.

E. Reports Required--Management Information System

1. Describe the process by which fiscal and participant information will be gathered to meet the established reporting requirements.

2. Indicate what unit will be responsible for which reports as well as the content of the reports (all reporting forms and instructions should be an attachment).

3. Indicate the time frames for submission of reports.

F. Equal Employment Opportunity - Indicate what mechanism will be used to insure EEO. If a plan is completed, attach it. If not, indicate when it will be completed.

G. Grievance Procedures - Describe the procedures established to deal with participant grievances and who is responsible for operating the procedure.

VII. Coordination and Linkages - Describe how this program will be coordinated with other deliverers of employment and training activities and any linkages that will exist with such programs. Include a description of the participant flow process, including a flow chart if applicable.

C. Budget and Budget Back-Up

The purpose of the budget is to show planned sub-agreement expenditures by specific line item. A budget summary sheet is an essential part of all sub-agreements. For convenience, budget back-up pages may also be included in sub-agreements which describe each line item in detail. If back-up pages are not included in the actual sub-agreement, they should be included as work sheets in the official sub-agreement file. If the sub-agreement is funded for more than one major activity, such as work experience and skills training, the prime sponsor may wish to add a budget cover sheet which summarizes the entire sub-agreement budget. In this case, there would be the budget cover sheet, two budget summary sheets (one for work experience and one for skills training), and two sets of budget back-up pages available (one set for each activity).

The budget summary sheet should show both projected cumulative and actual monthly accrued expenditures. Expenditures will probably prove easier to track for both the prime sponsor and the sub-grantee/contractor if both cumulative and monthly expenditures are shown. The prime sponsor usually furnishes such formats to sub-grantee/contractors. There is much latitude for local decisions in the preparation and utilization of budget materials, and each prime sponsor should prepare forms and reports to make its job easier for auditing, control, and reporting purposes.

While it is the sub-grantee's/contractor's responsibility to insure that funds are efficiently expended only for his particular sub-agreement, the prime sponsor has the responsibility to insure that all CETA grant funds are expended according to CETA requirements. There are several specific responsibilities of the prime sponsor in this area:

1. The prime sponsor must determine how extensive the back-up should be for the sub-agreement budget and provide forms accordingly. The budget should be summarized on a separate form. For ease in completing the forms, the line items on the summary sheet should be referenced on the back-up pages.

2. It is very important that the prime sponsor train each sub-grantee and contractor before sub-agreement operation begins--in the prime sponsor's CETA budget process; the definition of CETA cost categories and program activities and; the allowable costs chargeable to each sub-agreement cost category. It is essential that the prime sponsor and each sub-grantee and contractor have the same understanding of budget terminology and procedures and that this understanding is maintained throughout sub-agreement operations.

3. The prime sponsor should also inform the sub-grantee/contractor about financial reporting requirements and reimbursement or payment schedules. Reporting and reimbursement requests can be combined on one form. The prime sponsor should check its established accounting system's payment requirements for information, certification, and back-up, then add any additional information CETA requires when designing reimbursement forms. The reimbursement form should be submitted within a specified number of days after the end of the reporting period. From this submittal, the payment document can then be prepared for payment to the sub-grantee or contractor.

4. All budgetary information and requirements should be included by the prime sponsor in the general and/or special provisions of the sub-agreement. Also, the requirements for prime sponsor approval of line item changes should be specified.

5. The prime sponsor should ascertain the accuracy of the sub-agreement budget by checking the calculations, worksheets, and back-up pages used in completing the sub-agreement budget.

To assist in determining the allowability of costs, the prime sponsor may consider developing allowability charts such as the samples shown on the following two pages.

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CHARGEABLE COST CATEGORIES BY FUNCTIONAL AREA

Functional Area:	Cost Categories:					
	Administration	Training	Services	Participant Wages	Participant Fringes	Participant Allowances
Classroom Training	X	X	X		X	X
On-The-Job Training	X	X	X			
Public Service Employment	X	X	X	X	X	
Work Experience	X	X	X	X	X	
Services to Participants	X		X	X	X	X*
Other Activities	X	X	X	X	X	X*

*Participants may be paid either allowances or wages for time spent in services and other activities, depending on the circumstances of their involvement in those activities.

August, 1976

APPLICABLE LINE ITEMS BY COST CATEGORIES

Line Items:	Cost Categories:					
	Administration	Training	Services	Participant Wages	Participant Fringes	Participant Allowances
Participant Salaries & Wages	X	X	X	X		
Participant Fringe Benefits	X	X	X		X	
Expendable Supplies	X	X	X		X	
Communications	X	X	X			
Sub-Contract Services	X	X	X			
Staff Travel	X	X	X			
Equipment Rental & Service	X	X	X			
Equipment Purchases	X	X	X		X	
Staff Training	X					
Building Rental & Utilization	X	X	X			
Allowances						X
Supportive Services			X	X	X	X*
Manpower Services			X	X	X	X*
Transportation (Participants)			X			
Other Activities	X	X	X	X	X	X*

*Participants may be paid either allowances or wages for time spent in services and other activities, depending on the circumstances of their involvement in those activities.

D. Participant Services Schedule

The participant services schedule shows enrollments, terminations, completions, end-of-month enrollment, and significant segments for each sub-agreement. If a sub-agreement is funded for more than one program activity, such as skills training and work experience, a separate participant services schedule should be completed for each activity. The same participant services schedule form can be used in both proposals and final sub-agreements.

The monthly and weekly reports contain the same categories described on the overall participant services schedule; the instructions are the same. The monthly report contains the plan for that month which is taken from the participant services schedule in the sub-agreement; the cumulative number of participants; the percentages of the plan accomplished that month and; the actual number served for the month alone (not cumulative). The weekly report contains the actual number of participants for the week and the cumulative number served to date.

These reports will enable the prime sponsor to closely assess the performance of each sub-agreement. The participant services reports should be examined in conjunction with the financial reports and invoices received from each sub-grantee/contractor monthly to make sure that costs are in line with the services being given. Such examination will enable the prime sponsor to deobligate funds from sub-agreements which are obviously not going to be spent as well as catch any problems before they turn into disasters.

E. Assurances and Certifications--General and Special Provisions

Each sub-grant and contract should contain the Assurances and Certifications from the prime sponsor's CETA grant which are applicable to that particular sub-grant or contract. The prime sponsor should also develop general provisions that are applicable to all sub-agreements (sometimes called the "boiler plate") as well as any special provisions that are applicable only in specific sub-agreements. For example, all sub-agreements should contain a general provision that specifies reporting requirements. A public service employment (PSE) sub-agreement should contain those special provisions that are applicable only to PSE. The entire provisions section of the sub-agreement should be followed by a signature sheet on which the sub-grantee's contractor's

authorized representative assures and certifies that the organization will adhere to the provisions contained therein. The purpose of including an assurances section in each sub-agreement is to specify all provisions that must be followed in carrying out the sub-agreement.

Section II: Implementation and Administration of Sub-Grants and Contracts

After a sub-grant or contract is written and signed by the authorized representatives of both parties to the sub-agreement, the last phase of the sub-agreement process begins: implementation and administration. This phase spans the active life of the sub-grant or contract from execution through close-out. The major function of the prime sponsor in administering sub-grants and contracts, as stated in section 98.27 of the CETA regulations, is to assure adherence both to applicable regulations and laws and to the terms contained in the sub-agreements themselves in carrying out the performance of each sub-agreement.

This section will discuss the following: records to be kept, methods of providing cash, audit procedures, modifications, disputes, and terminations.

A. Records to be Kept

The prime sponsor should maintain an official file for each sub-agreement written. In order to assure that each contractor/sub-grantee maintains such an official file as well, each sub-agreement should contain a clause requiring the establishment of an official sub-agreement file and its contents. The sub-agreement should also specify all reports required and a time schedule for delivery of reports to the prime sponsor.

Section 98.18 of the CETA regulations specifies that the prime sponsor maintain the following for each CETA participant: personal identifying information, residence, work history, CETA program activities in which the individual participated, supportive and manpower services received, and the status of the participant at termination from CETA. The Forms Preparation Handbook contains specific instructions and definitions. Such information should be contained in the official sub-agreement files so that the prime sponsor is able to comply with the record maintenance requirements. Title III prime sponsors should check sections 97.167, 97.265, and/or 97.364 as applicable of the CETA regulations for specific Title III records maintenance requirements.

In addition to the required participant information, the official file for each sub-agreement should contain:

1. Documentation of the procurement method used. (This should include the reasons why the particular procurement method was chosen, any necessary approvals obtained (as for sole source procurement), and reasons for the award, as well as all procurement records.)

2. A copy of the complete sub-grant/contract along with any modifications to it.

3. Fiscal and accounting records, such as invoices, receipts, time sheets, payroll records, cancelled checks, etc. (See the Fiscal Activities Guide and the Forms Preparation Handbook for details).

4. Any correspondence between the prime sponsor and the contractor/sub-grantee.

5. All monitoring and evaluation reports, including corrective action plans, if necessary, and their resolution (See the Program Assessment Guide).

6. Any disputes between the prime sponsor and the contractor/sub-grantee and their resolution.

7. The reason for completion of the sub-agreement--expiration or termination. (If termination, the reason(s) for and type of termination.)

8. The completed close-out package.

The CETA Audit Guide should be referenced for specific instructions on the necessary file documentation for audit purposes.

In addition to specifying the required records to be forwarded to the prime sponsor, each sub-agreement should specify which records each contractor and sub-grantee should keep, which records the contractor or sub-grantee should initiate, and which records are to be initiated elsewhere but sent to and maintained by the contractor or sub-grantee. By including such information in the sub-agreement, the prime sponsor thereby has a means of assuring compliance with reporting and file maintenance requirements.

Following is a chart showing an example of participant records a contractor or sub-grantee should maintain, whether or not they are initiated by that particular contractor or sub-grantee:

	Classroom Training	Work Experience	On-the-Job Training	Public Service Employment	Services to Participants: Supportive Services	Manpower Services
Employability Plan	X	X	X	X*	X	X
Services Rendered Record					X	X
Job or Site Description		X	X	X		X
Counseling Records	X	X	X	X*		X
Progress Reports/Participant Evaluation	X	X	X	X*		X
Time and Attendance Record	X	X	X	X		X
Termination Notice	X	X	X	X	X	X
Status Change Notice	X	X	X		X	X
Participant Info. Record	X	X	X	X	X	X

*Depending on program design, these records may or may not be necessary.

All required records must be kept by the prime sponsor for three years from the date of submission of the annual or final expenditure report to the Department of Labor (ETA) with the following exceptions:

1. Records must be kept beyond three years if audit findings have not been resolved;

2. Records for non-expendable property acquired with Federal grant funds must be retained for three years after the disposition of the property;

3. If grant program records are transferred to or maintained by the Secretary of Labor (or his agent), records need not be retained by the original grantee.

See FMC 74-7, Attachments C and N, and Section 98.18 of the CETA regulations for further details.

B. Methods of Providing Cash

The prime sponsor should determine prior to the beginning date of each sub-agreement the method to be used for providing cash for sub-agreement operations. Whatever method the prime sponsor uses for providing cash to sub-grantees/contractors, all cash disbursed for CETA purposes must be reported on an accrual basis.

1. Reimbursement for Performance

This payment method provides funds after the contractor or sub-grantee performs the services or articles as specified in the sub-agreement. This payment method eliminates the additional safeguards needed with advanced financing and "guarantees" prompt submission of reports--no payment without reports. Such reimbursement requirements should also be included in the sub-agreement provisions.

2. Advance Financing

In all probability, most contractors and sub-grantees will request cash in advance of performance. Section 98.2 (a) (2) of the CETA regulations requires prime sponsors to establish "substantially identical procedures for advances to sub-grantees and other secondary recipients" that the prime sponsor follows. If advance funding is provided, there should be adequate safeguards in the sub-agreement provisions to protect the cash forwarded. Also, advance

payments should be deducted from payments that follow. A provision for such subsequent payment deduction should also be included in the sub-agreement (See Part I of the Fiscal Activities Guide for further information.)

3. Letter of Credit

If the prime sponsor utilizes a letter of credit system for payment to sub-grantees and contractors, the same requirements for letter of credit limitations used by the Federal government should be made applicable to sub-agreements by inclusion in the sub-agreement provisions (see Part I of the Fiscal Activities Guide for letter of credit requirements).

4. Requisition

A method similar to the letter of credit system is that of providing the contractor or sub-grantee authority to request checks as cash is needed. A requisition form is prepared and signed by the contractor of sub-grantee and sent either to the prime sponsor directly or to the prime sponsor's treasurer, depending upon the prime sponsor's instructions.

C. Sub-agreement Audit Procedures

One of the requirements placed on prime sponsors for assuring financial integrity of sub-agreements is that of auditing. Section 98.6 of the CETA regulations states that each prime sponsor shall conduct an independent audit at least once every two years of sub-grants and contracts of $100,000 or more. Audits of sub-agreements under $100,000 may be conducted on a sample basis as coordinated with and approved by the Regional Administrator for Audit. Under all circumstances, the prime sponsor "must insure that program activities and related costs incurred by contractors or sub-grantees are in compliance with Federal requirements as stated in paragraph 98.5 (a)" of the CETA regulations.

1. Independent Auditor

The prime sponsor may recognize an independent auditor or accountant as the audit agent to act in its behalf in auditing a sub-agreement. However, the independent auditor approved by the prime sponsor must conform to the requirement of the Comptroller of the United States of not having present or past association with the contractor or sub-grantee in other than an audit capacity.

2. Public or Internal Auditor

The prime sponsor also has the option of using either of the following:

Public Auditor. A prime sponsor may use public auditors if the contractor or sub-grantee is a public institution or a private non-profit organization. This allows the prime sponsor to utilize a city, county, or State auditor as long as the auditor is independent of the contractor of sub-grantee and makes no programmatic or financial decisions in connection with the sub-agreement (other than making audit findings).

Internal Auditor. A prime sponsor can select an auditor who is internal to the prime sponsor's own organization to meet the requirements for preliminary survey audits and periodic formal audits of sub-agreements. When internal auditors from the prime sponsor's organization are used, the prime sponsor should either choose or approve the choice of the auditor in order to assure that the auditor meets the requirement for having no connection with the sub-grantee or contractor in other than an audit capacity.

3. Evaluation of Accounting Controls

The prime sponsor should establish clearly defined accounting controls for all monies to be paid to any contractor and sub-grantee. Further, the prime sponsor should evaluate those controls by means of both a preliminary on-site review early in the sub-agreement period and reviews throughout the life of the sub-agreement. These reviews should evaluate the effectiveness of the contractor's or sub-grantee's administrative procedures and ensure that financial controls meet the minimum criteria established in the sub-agreement. The reviews should be uniform in content and subjects covered and should include a summary findings report. If the prime sponsor discovers any irregularities, they should be resolved as soon as possible.

4. Audit Preparation

In preparing for a formal sub-agreement audit, the prime sponsor should notify the contractor or sub-grantee of the date and scope of the audit preparation visit. The contractor or sub-grantee should then review all internal procedures, controls, written policies, and documentation of accrued expenditures. The accounting records should be up to date and all supportive

invoices, receipts, etc., gathered. If this material cannot be assembled in one place, the contractor or sub-grantee should develop a list showing the location of each item of documentation.

5. Formal Audit

The prime sponsor should develop detailed formal audit procedures that are in conformance with the CETA Audit Guide. This allows the prime sponsor to conduct formal audits of sub-agreements in both an acceptable and consistent format.

6. Allowability of Sub-agreement Costs

It is recommended that a prime sponsor develop with each contractor and sub-grantee a set of cost definitions and cost allowability so that both have a common understanding of what the costs are and how they are to be recorded. The prime sponsor should incorporate into the general or special provisions of each sub-agreement restrictions and definitions of costs contained in FMC 74-4, Section 98.12 of the CETA regulations, and any additional or localized cost definitions or categories necessary.

7. Questions of Costs

In the course of a periodic review or audit, costs may be questioned by the auditor. Such problems should be resolved between the prime sponsor and the sub-grantee/contractor as quickly as possible. The action taken resolving the problems should be documented both in the prime sponsor's and the sub-grantee's or contractor's official sub-agreement files. In this way, the prime sponsor's records will be kept accurate and up-to-date for audit by the Department of Labor.

D. Modifications to Contracts and Sub-Grants

If it becomes necessary to change any of the specifications, performance requirements, funding levels, etc., of a contract or sub-grant, a modification or change order in writing must be made. Also, if the prime sponsor has a sub-agreement corrective action system, a modification is necessary to incorporate any corrective actions into the sub-agreement.

There are two types of modifications: (1) a unilateral modification which needs only the signature of the prime sponsor's authorized representative to become effective; and (2) a bilateral modification which must be signed by

both the prime sponsor's and the contractor's or sub-grantee's authorized representatives to become effective.

The contract or sub-grant should specify the circumstances under which a modification may be made, the procedures for modifying the sub-agreement, the uses of a unilateral or bilateral modification, the procedures for any additional costs associated with a modification, and any other procedural considerations.

E. Disputes

It is recommended that the prime sponsor establish a written disputes process for resolving problems between the prime sponsor and the sub-grantee/contractor before the termination point is reached. This could include a corrective action process in which the problem is defined along with methods of solving the problem and a time frame for accomplishment. It is also possible to have an appeals process for resolution of disputes. The entire disputes procedure should be incorporated in the general provisions of each sub-agreement.

F. Termination

There are two circumstances under which a contract or sub-grant is closed out: either the completion date is reached and the sub-agreement expires or it is terminated before the completion date. FMC 74-7, Attachment L, is the basic reference for termination procedures. It provides for two types of termination: for cause and for convenience.

1. Termination for Cause

The prime sponsor may terminate any contract or sub-grant in whole or in part at any time prior to the completion date whenever the prime sponsor determines that the sub-grantee or contractor has failed to comply with any of the sub-agreement conditions. Such a termination notice is made in writing to the sub-grantee/contractor which states the reasons for and effective date of the termination.

2. Termination for Convenience

A termination for convenience is used whenever the prime sponsor or the contractor/sub-grantee mutually agree that the continuation of the sub-agreement would not provide benefits commensurate with further expenditure of funds. The request for such a termination can come from either part to the sub-agreement.

3. Termination Procedures

Whenever a termination occurs, the following should also occur:

a. The contractor or sub-grantee should cease all program activity and expenditure of funds as of the effective date of termination. The prime sponsor should be liable only for services rendered prior to the effective date of the termination, provided that such services performed are in accordance with the provisions of the sub-agreement.

b. The contractor or sub-grantee should immediately refund to the prime sponsor any unencumbered balance of cash advanced.

c. The contractor or sub-grantee must account for any property acquired with prime sponsor CETA funds in accordance with FMC74-4, Attachment N, or MA Property Handbook No. 303.

d. A final audit of the sub-agreement should be performed.

e. Close-out should be completed within the specified time period.

f. If it possible for the contractor/sub-grantee to make any claims against the sub-agreement after termination, this should be specified in the sub-agreement along with a time limit for such claims.

Section III: Close-Out of Sub-Agreements

The final phase of the sub-agreement process is the close-out procedure. The suggested close-out procedure in this handbook is intended to guard against the misuse of funds, expedite close-out, afford a measure of legal protection to the prime sponsor, and assist the prime sponsor in complying with the CETA close-out provisions.

The prime sponsor may wish to develop a more simplified close-out procedure for small on-the-job training contracts or public service employment sub-agreements which includes submittal of only a final invoice, property inventory, and final participant report to complete close-out.

The close-out process begins when the sub-agreement either expires or is terminated. In order to begin close-out, all required work under the sub-agreement must have been completed and the date reached on which prime sponsor funding ends. The sub-agreement is officially closed when all administrative actions have been completed, including final payment, and a release or settlement document has been signed by both parties to the sub-agreement. A release or settlement document is also required with a partially terminated sub-agreement.

The prime sponsor should forward the close-out package to the sub-grantee/contractor in advance of the sub-agreement expiration date. This allows the sub-grantee/contractor to resolve any problems in completing the package, finalize the required reports, and meet the previously set due date for submission of the completed package to the prime sponsor. All close-out procedures should be specified in the general provisions of each sub-agreement.

Prime sponsors should reference Section 98.17 of the CETA regulations for close-out responsibilities of the prime sponsor. The prime sponsor should ascertain that the close-out procedures for their sub-grantees and contractors will enable the prime sponsor to meet the close-out requirements of the CETA regulations.

Section IV: Model Contract

Sample Cost-Reimbursement Sub-Agreement

The following is a sample cost-reimbursement sub-agreement which could be used either as a sub-grant or a contract. The format could also be used for a fixed-price sub-agreement. It contains:

A. Two samples of signature sheets,

B. A completed narrative (work statement),

C. Budget and budget back-up forms,

D. Participant services schedule forms, and,

E. Sample assurances and provisions.

This format contains everything a sub-agreement will probably need. It can be added to or subtracted from as the prime sponsor requires.

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A. Sample Contract/Sub-grant Signature Sheet #1

Contract/Subgrant No. _____

Grantor (Prime Sponsor)	Contractor/Sub-grantee	Modification No.

This contract/sub-grant is entered into by the Prime Sponsor, hereinafter referred to as the Grantor and _____ hereinafter referred to as the Contractor/Sub-grantee. The Contractor/Sub-grantee agrees to operate a program(s) of the Grantor's Comprehensive Employment and Training Act (CETA) Program in accordance with the provisions of this agreement. This Contract/Sub-grant consists of this sheet, the budget, the budget back-up, reporting forms, a narrative description of the program, a participant services schedule, and the assurances and certifications.

A. Type of Agreement

☐ Cost Reimbursement ☐ Cost Plus Fixed Fee ☐ Fixed Price

☐ Cost Plus Award Fee ☐ Cost Plus Incentive Fee ☐ Fixed Unit Price Plus Incentive Fee

B. Obligation

Total cost to the Prime Sponsor's CETA grant will not exceed $_____.

This cost will cover the period _____ to _____

C. Modification

(1) This modification ☐ increases ☐ decreases ☐ does not change the funds previously obligated by $_____ to a total obligation of $_____.

(2) Description of Modification

_____

_____

Approved for the Grantor		Approved for the Contractor/Sub-grantee	
By (Signature)		By (Signature)	
Name and Title	Date	Name and Title	Date

A. Sample Signature Sheet #2

AGREEMENT NUMBER ___

WHEREAS, the State/County/City of _____ as the Prime Sponsor, has entered into an AGREEMENT with the United States Department of Labor, Employment and Training Administration, to implement a Comprehensive Employment and Training Program in the _____ pursuant to the provisions of the Comprehensive Employment and Training Act of 1973, as amended, and,

WHEREAS, the Prime Sponsor desires that

NAME: _____

ADDRESS: _____

_____, be the

Operating Agency to implement _____ for _____ participants.

NOW THEREFORE, the Operating Agency hereby agrees to perform the functions set forth under the terms and conditions established in this _____ type of sub-grant/contract/agreement (state cost-reimbursement, fixed price, cost plus incentive fee, fixed price plus incentive, cost plus award fee, cost plus fixed fee or other type in the above blank space). This sub-grant/contract/agreement consists of the following:

I. Program Narrative
II. Participant Service Schedule
III. Budget
IV. Assurances and Certification

The functions of the Operating Agency are to commence on _____ and shall be undertaken and completed in such sequence as to assure their effectual accomplishment in light of the purpose of this sub-grant/contract/agreement, but in any event, all of the actions required hereunder and any obligations to and of the Prime Sponsor, shall commence _____ and shall be completed by _____.

IN CONSIDERATION of the foregoing, the Prime Sponsor does agree to pay the Operating Agency allowable costs incurred in the performance of this sub-grant/contract/agreement, in an amount up to but not to exceed $_____ to be paid from Federal funds received.

SIGNATURES

Prime Sponsor Name and Address

_____

_____

_____

BY: _____
(Signature)

NAME and TITLE: _____

_____

_____

DATE: _____

ATTEST: _____

Approved for the Operating Agency

Signature: _____

Name: _____

Title: _____

_____

DATE: _____

ATTEST: _____

B. Sample Narrative (Work Statement)

Explanation: This sample narrative or work statement describes a vocational skills training program operated by a skills center. It shows one method of completing a narrative.

Skills Training Narrative

A. Program Goals

The Well-Known County Skills Training Center (hereinafter called the contractor), under a cost-plus-award fee contract from the Well-Known County CETA Prime Sponsor, will provide skills training for the unemployed, underemployed, and economically disadvantaged residents of Well-Known County who are selected by the prime sponsor to participate in the skills training program. Training will be provided to bring participants to industrial, commercial, and professional standards in the occupations listed in Section C of this narrative for at least entry level job performance in permanent, meaningful employment.

B. Types of Services and Activities

Skills training will be implemented as follows:

- CETA participants will be recruited and selected by the prime sponsor. Applicants who inquire at the skills center will be referred to the prime sponsor for determination of eligibility and appropriate referral.

- The secretarial course and licensed practical nursing course will have training entrance criteria. Application of entrance criteria will be performed by joint decision of the prime sponsor and the contractor.

- Courses will operate by continuous slotting (open entry/open exit) except for the licensed practical nursing course, during the period of October 1, 1976 to September 30, 1977.

- Contractor staff will provide special, individualized instruction when necessary.

- Skill training will provide for the completion of the training program in the shortest possible time.

- The contractor will be responsible for individual participant counseling.

- Contractor staff will inform the prime sponsor of each participant approaching completion of training at least four weeks prior to completion of the course.

- In the case of unsatisfactory performance of a CETA participant, a joint conference of prime sponsor and contractor staff will take place before termination.

- The contractor will be responsible for employability development of the participants through techniques such as group counseling, practice job interviews, etc.

- Detailed curricula for each course are provided by the contractor in Attachment A (not included for this sample).

- Books provided to participants for use during the skills training course which can be useful to them after the course (such as Business English for secretarial students) will remain with the participants after successful completion of the course.

- Students who become job-ready will be cooperatively placed by contractor and prime sponsor job placement staff. Final responsibility for job placement rests with the prime sponsor.

- Hours of instruction will be 7 hours per day, 5 days per week, from 8:30 a.m. to 4:00 p.m. with one-half hour for lunch.

- The training center will be closed on weekends and the following days (relevant holidays):

C. Program Objectives

The following courses will be provided by the contractor:

	Continuous # of Slots	Start Date	End Date	Class Length
Beautician/Cosmetologist[1.]	20	10-1-76	9-30-77	1 yr.
Dental Assistant[2.]	16	10-1-76	2-29-77	5 mos.
		3-1-77	6-30-77	5 mos.
Secretary[3.]	18	10-1-76	3-31-77	6 mos.
	18	4-4-77	9-30-77	6 mos.
Licensed Practical Nursing[4.]	35	10-1-76	9-30-77	1 yr.

Program Year to Date Plan

	12-31-76 Tot. Serv.	12-31-76 Curr. Enroll.	3-31-77 Tot. Serv.	3-31-77 Curr. Enroll.	6-30-77 Tot. Serv.	6-30-77 Curr. Enroll.	9-30-77 Tot. Serv.	9-30-77 Curr. Enroll.
Beautician/Cosmetologist[1.]	20	20	21	20	24	20	24	0
Dental Assistant[2.]	16	16	36	16	40	16	40	0
Secretary[3.]	20	18	22	18	42	18	44	0
Licensed Practical Nursing[4.]	37	35	37	35	37	35	37	0

Performance Standards for Each Course (Measurable Objectives)

1. It is projected that 80 percent of entering participants taking the Beautician/Cosmetologist Course will successfully complete the course and pass the State Licensing Test.
2. It is projected that 75 percent of entering participants taking the Dental Assistant course will successfully complete the course and pass the State Licensing Exam.
3. It is projected that 80 percent of entering participants taking the Secretarial Course will successfully complete the course, typing at least 80 words per minute.
4. It is projected that 90 percent of entering participants taking the Licensed Practical Nursing course will successfully finish the course; 85 percent will pass the State Licensing Exam.

D. Staffing

Job descriptions and resumes of staff will be on file with the contractor and available for review by the prime sponsor. The prime sponsor shall have the authority to require satisfactory performance of contractor staff assigned to CETA participants. Contractor staff shall attend prime sponsor staff training as required.

E. Reimbursement

(Alternatives based on type of reimbursement chosen)

1. Vouchers will be submitted on a monthly basis to the prime sponsor for billing of expenses actually incurred using forms provided by the prime sponsor.

2. Vouchers will be submitted monthly to the prime sponsor on a fixed cost per training hour basis. The cost per hour will be $_____ for Beautician/Cosmetologist, $_____ for Dental Assistant, $_____ for Secretarial and $_____ for Licensed Practical Nursing.

3. Vouchers will be submitted monthly to the prime sponsor for payment on a combination fixed cost/number of completion basis. The costs per hour of training will be $_____ for Beautician/Cosmetology, $_____ for Dental Assistant, $_____ for Secretarial and $_____ for Licensed Practical Nursing, (the rate could be half the rate in #2 above). The rate per successful completion will be $_____ for Beautician/Cosmetologist, $_____ for Dental Assistant, $_____ for Secretarial, and $_____ for Licensed Practical Nursing.

F. Property

A list of property to be purchased, leased, or rented for this program, including costs, is part of the attached approved budget. (Not included in this sample).

G. Reports Required

1. The contractor will provide to the prime sponsor on a monthly basis within five working days after the end of the month a summary of student enrollment, financial reports, participant program reports and other reports at such time and in such form as may be required by the prime sponsor. Copies of the activity and financial report forms are attached. (Not included in this sample.)

2. The contractor will maintain time and attendance records on participants and staff.

H. Equal Employment Opportunity

The contractor will submit to the prime sponsor a written affirmative action compliance program within 60 calendar days of the signature of this contract.

I. Grievance Procedure

CETA participants may appeal any decision or action taken by the contractor or the prime sponsor, as outlined in the attached procedure given to participants at intake.

J. Participant Allowance Payment System

Participants will be paid in accordance with prime sponsor policy for each hour of attendance in class, counseling, and/or other training-related activities, to be verified by time and attendance reports. The prime sponsor will handle all actual allowance payments through the Well-Known County payroll procedures.

Conclusion:

The information regarding contracting was taken from the U.S. Department of Labor Employment and Training Administration Technical Assistance Document - Sub-Agreement Development Handbook for CETA Prime Sponsors. The document is not available for wide distribution and is quite lengthy in its entirety (over 150 pages). I have attempted to extract the bare essentials for the purposes previously outlined.

However, the document also includes additional information regarding the contracting process, information on Methods of Procurement and the Request for Proposal Process, including sample budget and back-up forms, sample participant services schedules, sample assurances and certifications, sample basic agreement and individual referral forms; invoice for reimbursement; training program report, sample OJT contract forms, sample close-out package, and sample grievance procedure.

These items appear in the Sub-Agreement Development Handbook for CETA Prime Sponsors and may be requested from the prime sponsor in your area or through the CETA-Interagency Coordination Project at the Illinois Community College Board, 518 Iles Park Place, Springfield, Illinois 62718.

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